

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ZUMA PRESS, INC., ACTION SPORTS PHOTOGRAPHY, INC., TIYU (BEIJING) CULTURE MEDIA CO. LTD., MANNY FLORES, ANDREW DIEB, CHRISTOPHER SZAGOLA, LOUIS LOPEZ, CHARLES BAUS, DUNCAN WILLIAMS, ROBERT BACKMAN, JOHN MIDDLEBROOK, ANTHONY BARHAM

Case No. 1:16-cv-6110-AKH

Plaintiffs,

- against -

GETTY IMAGES (US), INC.

Defendant.

**DECLARATION OF RICHARD P. LIEBOWITZ, ESQ.**

I, RICHARD P. LIEBOWITZ, declare under the penalty of perjury as follows:

1. I am attorney with the Liebowitz Law Firm PLLC (the “Firm”), where I am a founder and managing attorney.
2. I am over the age of 18 years old, competent to testify and a member in good standing of the New York State Bar.
3. I am admitted to practice before this Court, serve as lead counsel for Plaintiffs in the above-referenced action and have personal knowledge of the facts stated herein.
4. I submit this declaration in support of Plaintiffs’ motion for partial summary judgment on liability for copyright infringement against Defendant Getty Images (US), Inc. (“Defendant” or “Getty”).

5. This declaration substantiates and authenticates evidence of Plaintiffs' (and Zuma's exclusive licensees') ownership of valid copyrights as well as Getty's actual copying of the registered works which are subject to this litigation.

**The Firm's Routine Practice of Registering Photographs With the Copyright Office**

6. It is the Firm's routine practice to register photographs with the U.S. Copyright Office (the "USCO") on behalf of the Firm's clients.

7. I directly supervise the registration process which takes place at the Firm's principal office located at 11 Sunrise Plaza, Ste. 305, Valley Stream, NY 11580.

8. My name, Richard Liebowitz, is listed on every copyright registration certificate that is at issue in this litigation under the section titled "Certification."

9. The Firm employs three individuals, Donna Halperin, Debbie Carrillo, and Laura Bivona (collectively, the "Copyright Support Staff") whose job function, among other things, is to assist me in the registration of clients' photographs with the USCO.

10. The photographs at issue on this summary judgment motion (the "Photographs") were all registered with the USCO by the Firm as part of its routine practice of registering clients' photographs.

11. The Copyright Support Staff were responsible for handling the administrative function of depositing copies of the Photographs in conjunction with each application for copyright registration.

12. The Copyright Support Staff's depositing of the Photographs with the USCO was carried out under my direct supervision and as part of the Firm's routine practice of registering clients' photographs.

13. Ms. Halperin, Ms. Carrillo and Ms. Bivona were all identified by Plaintiffs in their Supplemental Disclosures pursuant to Fed.R.Civ. P. 26(e). However, despite Defendant's opportunity to do so, no member of the Copyright Support Staff was deposed during the course of discovery.

**Getty's Excel Spreadsheet Showing Photographs Copied by Getty**

14. Attached hereto as Exhibit 1-A is a true and correct copy of an Excel spreadsheet produced by Getty during discovery, and bearing date-stamp nos. GETT00000001, which shows that the Photographs were copied by Getty (the "Original Excel Spreadsheet").

15. Attached hereto as Exhibit 1-B is a true and correct copy of the Original Excel Spreadsheet but which, for organizational purposes, has been *modified* as follows: (a) Column A has been added to the Original Excel Spreadsheet which lists the photographer associated with each photograph listed (or the agency which owns the works of the photographer by virtue of an employment or work-for-hire relationship); and (b) the Original Excel Spreadsheet has been *re-ordered* so that the list displays information photographer-by-photographer (or agent-by-agent). Otherwise, the Original Excel Spreadsheet attached hereto as Exhibit 1-B is in all substantive respects, in terms of data and information, identical to the Original Excel Spreadsheet. The Original Excel Spreadsheet, as modified in Exhibit 1-B, shall be referred to herein as the "Getty Spreadsheet."

16. The Getty Spreadsheet lists the following columns:

A- "Photographer": the name of the photographer who created the photograph (or the agency which owns the works of the photographer by virtue of an employment or work-for-hire relationship);

B- "Corbis ID#": I do not have knowledge of what information this column refers to;

C- “CorbisData\_CAPTION”: the descriptive information about the photograph, including a description of the subject matter depicted in the photograph, the date when the photograph was taken, and the credit attributed to the photograph, as displayed in Corbis’ metadata;

D- “INPUT DATE”: I do not have knowledge of what information this column refers to;

E- “ORIGINALFILENAME”: the name assigned by Zuma to the jpeg file associated with the photograph. Significantly, the title of the jpeg file listed under ORIGINALFILE NAME is identical to the title of the .jpg file listed in Zuma’s Screenshot photos. Also, the ORIGINALFILENAME contains the first date of publication on Zuma’s website;

F- “PUBLISHEDDATE”: I do not have knowledge of what information this column refers to;

G- “SOURCE”: I do not have knowledge of what information this column refers to;

H- “Getty\_MASTER\_ID”: the number assigned by Getty to each photograph;

I- “EDITORIAL\_CONTRACT”: I do not have knowledge of what information this column refers to;

J- “GettyData\_CAPTION”: Getty’s description of each photograph;

K- “EDITORIAL\_READY\_FOR\_PUBLISH”: I do not have knowledge of what information this column refers to;

### **Group Registration of Published Photographs**

17. Under the authority granted to the Copyright Office by 17 U.S.C. § 408(c)(1), and pursuant to 37 C.F.R. § 202.4(i), a group of published photographs can be registered on a single form with a single fee if: (a) all the photographs are by the same photographer (if an employer

for hire is named as author, only one photographer's work can be included); (b) all the photographs are published in the same calendar year; and (c) all the photographs have the same copyright claimant.

18. The copyright registrations attached to this declaration are all subject to and meet the requirements of the regulations which govern a Group Registration of Published Photographs pursuant to 37 C.F.R. § 202.4(i).

**Display of the ORIGINALFILENAME in the Content Titles of the Copyright Registrations**

19. The ORIGINALFILENAME of each photograph, as set forth in Exhibit 1-B, is displayed in and corresponds with the content titles listed on the face of the copyright registration certificates (except that the name of the photographer has been included on the face of the registration).

20. Attached hereto as Exhibit 1-C is a compilation of documents showing that the ORIGINALFILENAME of a photograph is displayed in and corresponds with the content titles listed on the face of the copyright registration certificates, which in turn correspond to the listing of the photograph on Getty's website

21. Intentionally blank paragraph.

**Format of This Declaration**

22. For the convenience of the Court, this declaration is divided into three parts:

- Part One - NAMED INDIVIDUAL PLAINTIFFS (Robert Backman, Anthony Barham, Charles Baus, Andrew Dieb, Manny Flores, Louis Lopez, John Middlebrook, Christopher Szagola, Duncan Williams);
- Part Two – ZUMA'S EXCLUSIVE PHOTOGRAPHERS (Altaf Zargar, Andrew Gyopar, Aristidis Vafeiadakis, Brian Cahn, Bryan Smith, Craig Durling, Dan Anderson, David Becker,

David Bukach, Erik Lesser, Gary Dwight Miller, Hector Acevedo, Howard Sayer, Jason Moore, Jed Conklin, Jeffrey Geller, Jeremy Breningstall, Jim Dedmon, Jonathan Alcorn, Mark Bialek, Mark Makela, Mark Sobhani, Marty Bicek, Mary Calvert, Matt Roberts, Mike Fuentes, Paul Kitagaki, Pete Marovich, Ralph Lauer, Rick Osentoski, Ricky Fitchett, Ringo Chiu, Ron Biljsma, Ruaridh Stewart, Scott Mitchell, Sergei Bachalov, Theodore Liasi, Timothy Hale, Wally Nell, David Stephenson;

- Part Three - PHOTO AGENCIES (Action Sports Photography, Inc. and Tiyu (Beijing Culture Media Co., Ltd. (“OSports”)).

## **PART ONE: NAMED INDIVIDUAL PLAINTIFFS**

### **Robert Backman**

23. Robert Backman is a named plaintiff and photographer who requested that the Firm register photographs on his behalf.

24. Backman is in possession of a copyright registration certificate, bearing No. VA 2-022-532 with effective date November 14, 2016 (the “532” Registration). A true and correct copy of the 532 Registration is attached hereto as Exhibit 2, bearing bate-stamp nos. BACK002411-2426.

25. Attached to Backman’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. BACK06052—6208 which are on deposit with the 532 Registration.

26. Backman is in possession of a copyright registration certificate, bearing No. VA 2-022-536 with effective date November 14, 2016 (the “536” Registration). A true and correct

copy of the 536 Registration is attached hereto as Exhibit 3, bearing bate-stamp nos.

BACK002397-2410.

27. Attached to Backman's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BACK06209—6781 which are on deposit with the 536 Registration.

28. On the face of the 532 Registration and 536 Registration (collectively, the "Backman Registrations"), Backman is listed as the sole Author and Copyright Claimant of all photographs contained therein.

29. The Firm's registration of the Backman Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

30. The photographs attached to the Declaration of Robert Backman are referred to herein as the "Backman Photographs".

31. The Firm deposited the Backman Photographs with the USCO as part of and in connection with the application for the Backman Registrations.

32. In Exhibit 1-B, the Backman Photographs are listed and described under # 43509-44247 on the first column of the Getty Spreadsheet, demonstrating that the Backman Photographs were copied by Getty.

### **Anthony Barham**

33. Anthony Barham is a named plaintiff and photographer who requested that the Firm register photographs on his behalf.

34. Barham is in possession of a copyright registration certificate, bearing No. VA 2-023-232 with effective date November 2, 2016 (the "232" Registration). A true and correct copy of the 232 Registration is attached hereto as Exhibit 4, bearing bate-stamp nos. BAR04682-4697.

35. Attached to Barham's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BAR09584-9984 and BAR10301-10545, which are on deposit with the 232 Registration.

36. Barham is in possession of a copyright registration certificate, bearing No. VA 2-022-662 with effective date November 7, 2016 (the "662" Registration). A true and correct copy of the 662 Registration is attached hereto as Exhibit 5, bearing bate-stamp nos. BAR04698-4711.

37. Attached to Barham's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BAR09309-9429 which are on deposit with the 662 Registration.

38. Barham is in possession of a copyright registration certificate, bearing No. VA 2-022-812 with effective date November 2, 2016 (the "812" Registration). A true and correct copy of the 812 Registration is attached hereto as Exhibit 6, bearing bate-stamp nos. BAR04666-4681.

39. Attached to Barham's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BAR09430-10300 which are on deposit with the 812 Registration.

40. On the face of the 232 Registration, 662 Registration and 812 Registration (collectively, the "Barham Registrations"), Barham is listed as the sole Author and Copyright Claimant of all photographs contained therein.

41. The Firm's registration of the Barham Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

42. The photographs attached to the Declaration of Anthony Barham are referred to herein as the "Barham Photographs".

43. The Firm deposited the Barham Photographs with the USCO as part of and in connection with the application for the Barham Registrations.

44. In Exhibit 1-B, the Barham Photographs are listed and described under # 2430-3677 on the first column of the Getty Spreadsheet, demonstrating that the Barham Photographs were copied by Getty.

**Charles Baus**

45. Charles Baus is a named plaintiff and photographer who requested that the Firm register photographs on his behalf.

46. Baus is in possession of a copyright registration certificate, bearing No. VA 2-022-779 with effective date November 18, 2016 (the “779” Registration). A true and correct copy of the 779 Registration is attached hereto as Exhibit 7, bearing bate-stamp nos. BAU04680-4695.

47. Attached to Baus’ declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. BAU12943-12946, which are on deposit with the 779 Registration.

48. Baus is in possession of a copyright registration certificate, bearing No. VA 2-022-781 with effective date November 18, 2016 (the “781” Registration). A true and correct copy of the 781 Registration is attached hereto as Exhibit 8, bearing bate-stamp nos. BAU04656-4663.

49. Attached to Baus’ declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. BAU13663-13902, which are on deposit with the 781 Registration.

50. Baus is in possession of a copyright registration certificate, bearing No. VA 2-022-829 with effective date November 18, 2016 (the “829” Registration). A true and correct copy of the 829 Registration is attached hereto as Exhibit 9, bearing bate-stamp nos. BAU04664-4679.

51. Attached to Baus’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. BAU12947-13662, which are on deposit with the 829 Registration.

52. On the face of the 779 Registration, 781 Registration and 829 Registration (collectively, the “Baus Registrations”), Baus is listed as the sole Author and Copyright Claimant of all photographs contained therein.

53. The Firm’s registration of the Baus Registrations was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

54. The photographs attached to the Declaration of Charles Baus are referred to herein as the “Barham Photographs”.

55. The Firm deposited the Baus Photographs with the USCO as part of and in connection with the application for the Baus Registrations.

56. In Exhibit 1-B, the Baus Photographs are listed and described under # 13191-14158 on the first column of the Getty Spreadsheet, demonstrating that the Baus Photographs were copied by Getty.

**Andrew Dieb**

57. Andrew Dieb is a named plaintiff and photographer who requested that the Firm register photographs on his behalf.

58. Dieb is in possession of a copyright registration certificate, bearing No. VA 2-023-095 with effective date October 31, 2016 (the “095” Registration). A true and correct copy of the 095 Registration is attached hereto as Exhibit 10, bearing bate-stamp nos. DIEB04451-4458.

59. Attached to Dieb’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. DIEB08972-9031, which are on deposit with the 095 Registration.

60. Dieb is in possession of a copyright registration certificate, bearing No. VA 2-022-189 with effective date October 30, 2016 (the “189” Registration). A true and correct copy of the 189 Registration is attached hereto as Exhibit 11, bearing bate-stamp nos. DIEB04371-4388.

61. Attached to Dieb’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. DIEB09032-9510 and DIEB09632-9786, which are on deposit with the 189 Registration.

62. Dieb is in possession of a copyright registration certificate, bearing No. VA 2-022-194 with effective date October 30, 2016 (the “194” Registration). A true and correct copy of the 194 Registration is attached hereto as Exhibit 12, bearing bate-stamp nos. DIEB04357-4372.

63. Attached to Dieb’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. DIEB09787-10051, which are on deposit with the 194 Registration.

64. Dieb is in possession of a copyright registration certificate, bearing No. VA 2-022-402 with effective date October 30, 2016 (the “402” Registration). A true and correct copy

of the 402 Registration is attached hereto as Exhibit 13, bearing bate-stamp nos. DIEB04459-4464.

65. Attached to Dieb's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. DIEB09511-9600, which are on deposit with the 402 Registration.

66. Dieb is in possession of a copyright registration certificate, bearing No. VA 2-022-874 with effective date October 30, 2016 (the "874" Registration). A true and correct copy of the 874 Registration is attached hereto as Exhibit 14, bearing bate-stamp nos. DIEB04435-4450.

67. Attached to Dieb's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. DIEB8956-8971 and DIEB09601-9631, which are on deposit with the 874 Registration.

68. On the face of the 095 Registration, 189 Registration and 194 Registration, 402 Registration, and 874 Registration (collectively, the "Dieb Registrations"), Dieb is listed as the sole Author and Copyright Claimant of all photographs contained therein.

69. The Firm's registration of the Dieb Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

70. The photographs attached to the Declaration of Andrew Dieb are referred to herein as the "Dieb Photographs".

71. The Firm deposited the Dieb Photographs with the USCO as part of and in connection with the application for the Dieb Registrations.

72. In Exhibit 1-B, the Dieb Photographs are listed and described under # 669-1942 on the first column of the Getty Spreadsheet, demonstrating that the Dieb Photographs were copied by Getty.

**Manny Flores**

73. Manny Flores is a named plaintiff and photographer who requested the Firm register photographs on his behalf.

74. Flores is in possession of a copyright registration certificate, bearing No. VA 2-023-256 with effective date November 18, 2016 (the "256" Registration). A true and correct copy of the 256 Registration is attached hereto as Exhibit 15, bearing bate-stamp nos. FLOR04812-4825.

75. Attached to Flores' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. FLOR12118-12699, which are on deposit with the 256 Registration.

76. Flores is in possession of a copyright registration certificate, bearing No. VA 2-023-258 with effective date November 8, 2016 (the "258" Registration). A true and correct copy of the 258 Registration is attached hereto as Exhibit 16, bearing bate-stamp nos. FLOR13738-13747.

77. Attached to Flores' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. FLOR12704-13007 and FLOR13189-13357, which are on deposit with the 258 Registration.

78. Flores is in possession of a copyright registration certificate, bearing No. VA 2-023-334 with effective date November 21, 2016 (the "334" Registration). A true and correct

copy of the 334 Registration is attached hereto as Exhibit 17, bearing bate-stamp nos. FLOR04768-4781.

79. Attached to Flores' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. FLOR11210-11810 and FLOR11831-11990, which are on deposit with the 334 Registration.

80. Flores is in possession of a copyright registration certificate, bearing No. VA 2-022-521 with effective date November 21, 2016 (the "521" Registration). A true and correct copy of the 521 Registration is attached hereto as Exhibit 18, bearing bate-stamp nos. FLOR04748-4763.

81. Attached to Flores' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. FLOR11024-11031, which are on deposit with the 521 Registration.

82. Flores is in possession of a copyright registration certificate, bearing No. VA 2-022-524 with effective date November 18, 2016 (the "524" Registration). A true and correct copy of the 524 Registration is attached hereto as Exhibit 19, bearing bate-stamp nos. FLOR13728-13737.

83. Attached to Flores' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. FLOR11811-11830 and FLOR11991-12117, which are on deposit with the 524 Registration.

84. Flores is in possession of a copyright registration certificate, bearing No. VA 2-022-528 with effective date November 18, 2016 (the "528" Registration). A true and correct copy of the 528 Registration is attached hereto as Exhibit 20, bearing bate-stamp nos. FLOR04808-4811.

85. Attached to Flores' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. FLOR12700-12703, which are on deposit with the 528 Registration.

86. Flores is in possession of a copyright registration certificate, bearing No. VA 2-038-588 with effective date November 18, 2016 (the "588" Registration). A true and correct copy of the 588 Registration is attached hereto as Exhibit 21, bearing bate-stamp nos. FLOR04836-4851.

87. Attached to Flores' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. FLOR11032-11209, FLOR13008-13188 and FLOR13358-13720, which are on deposit with the 588 Registration.

88. On the face of the 256 Registration, 258 Registration, 334 Registration, 521 Registration, 524 Registration, 528 Registration and 588 Registration (collectively, the "Flores Registrations"), Flores is listed as the sole Author and Copyright Claimant of all photographs contained therein.

89. The Firm's registration of the Flores Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

90. The photographs attached to the Declaration of Manny Flores are referred to herein as the "Flores Photographs".

91. The Firm deposited the Flores Photographs with the USCO as part of and in connection with the application for the Flores Registrations.

92. In Exhibit 1-B, the Flores Photographs are listed and described under # 37315-40951 on the first column of the Getty Spreadsheet, demonstrating that the Flores Photographs were copied by Getty.

**Louis Lopez**

93. Louis Lopez is a named plaintiff and photographer who requested the Firm register photographs on his behalf.

94. Lopez is in possession of a copyright registration certificate, bearing No. VA 2-038-029 with effective date February 20, 2017 (the “029” Registration). A true and correct copy of the 029 Registration is attached hereto as Exhibit 22, bearing bate-stamp nos. LOP08745-8758.

95. Attached to Lopez’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. LOP20420-20566 and LOP22934-23478, which are on deposit with the 029 Registration.

96. Lopez is in possession of a copyright registration certificate, bearing No. VA 2-025-318 with effective date November 21, 2016 (the “318” Registration). A true and correct copy of the 318 Registration is attached hereto as Exhibit 23, bearing bate-stamp nos. LOP08807-8822.

97. Attached to Lopez’ declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. LOP20182-20419 and LOP20985 and LOP22160-22298, which are on deposit with the 318 Registration.

98. Lopez is in possession of a copyright registration certificate, bearing No. VA 2-025-320 with effective date November 21, 2016 (the “320” Registration). A true and correct copy of the 320 Registration is attached hereto as Exhibit 24, bearing bate-stamp nos. LOP08791-8806.

99. Attached to Lopez's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. LOP21284-21531 and LOP21854-22159, which are on deposit with the 320 Registration.

100. Lopez is in possession of a copyright registration certificate, bearing No. VA 2-025-322 with effective date November 21, 2016 (the "322" Registration). A true and correct copy of the 322 Registration is attached hereto as Exhibit 25, bearing bate-stamp nos. LOP08775-8789.

101. Attached to Lopez's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. LOP20989-21040, which are on deposit with the 322 Registration.

102. Lopez is in possession of a copyright registration certificate, bearing No. VA 2-025-332 with effective date November 21, 2016 (the "332" Registration). A true and correct copy of the 332 Registration is attached hereto as Exhibit 26, bearing bate-stamp nos. LOP08827-8842.

103. Attached to Lopez' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. LOP22299-22933, which are on deposit with the 332 Registration.

104. Lopez is in possession of a copyright registration certificate, bearing No. VA 2-025-333 with effective date November 21, 2016 (the "333" Registration). A true and correct copy of the 333 Registration is attached hereto as Exhibit 27, bearing bate-stamp nos. LOP08843-8858.

105. Attached to Lopez's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. LOP20567-20988 and LOP21532-21853, which are on deposit with the 333 Registration.

106. Lopez is in possession of a copyright registration certificate, bearing No. VA 2-062-587 with effective date July 27, 2017 (the "587" Registration). A true and correct copy of the 587 Registration is attached hereto as Exhibit 28, bearing bate-stamp nos. LOP08935-8950.

107. Attached to Lopez's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. LOP21041 and LOP21114-21283, which are on deposit with the 587 Registration.

108. On the face of the 029 Registration, 318 Registration, 320 Registration, 322 Registration, 332 Registration, 333 Registration and 587 Registration (collectively, the "Lopez Registrations"), Lopez is listed as the sole Author and Copyright Claimant of all photographs contained therein.

109. The Firm's registration of the Lopez Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

110. The photographs attached to the Declaration of Louis Lopez are referred to herein as the "Lopez Photographs".

111. The Firm deposited the Lopez Photographs with the USCO as part of and in connection with the application for the Lopez Registrations.

112. In Exhibit 1-B, the Lopez Photographs are listed and described under # 33482-37314 on the first column of the Getty Spreadsheet, demonstrating that the Lopez Photographs were copied by Getty.

**John Middlebrook**

113. John Middlebrook is a named plaintiff and photographer who requested the Firm register photographs on his behalf.

114. Middlebrook is in possession of a copyright registration certificate, bearing No. VA 2-038-066 with effective date November 23, 2016 (the “066” Registration). A true and correct copy of the 066 Registration is attached hereto as Exhibit 29, bearing bate-stamp nos. MID04497-4511.

115. Attached to Middlebrook’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. MID09636-10044 and MID10242-10568, which are on deposit with the 066 Registration.

116. Middlebrook is in possession of a copyright registration certificate, bearing No. VA 2-038-067 with effective date November 23, 2016 (the “067” Registration). A true and correct copy of the 067 Registration is attached hereto as Exhibit 30, bearing bate-stamp nos. MID04529-4542.

117. Attached to Middlebrook’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. MID09225-9330, which are on deposit with the 067 Registration.

118. Middlebrook is in possession of a copyright registration certificate, bearing No. VA 2-038-068 with effective date November 23, 2016 (the “068” Registration). A true and correct copy of the 068 Registration is attached hereto as Exhibit 31, bearing bate-stamp nos. MID04513-4528.

119. Attached to Middlebrook’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. and MID09331-9506, which are on deposit with the 068 Registration.

120. Middlebrook is in possession of a copyright registration certificate, bearing No. VA 2-038-069 with effective date November 23, 2016 (the “069” Registration). A true and correct copy of the 069 Registration is attached hereto as Exhibit 32, bearing bate-stamp nos. MID04581-4596.

121. Attached to Middlebrook’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. MID09066-9224 and MID09507-9635, which are on deposit with the 069 Registration.

122. On the face of the 066 Registration, 067 Registration, 068 Registration and 069 Registration (collectively, the “Middlebrook Registrations”), Middlebrook is listed as the sole Author and Copyright Claimant of all photographs contained therein.

123. The Firm’s registration of the Middlebrook Registrations was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

124. The photographs attached to the Declaration of John Middlebrook are referred to herein as the “Middlebrook Photographs”.

125. The Firm deposited the Middlebrook Photographs with the USCO as part of and in connection with the application for the Middlebrook Registrations.

126. In Exhibit 1-B, the Middlebrook Photographs are listed and described under # 29578-31110 on the first column of the Getty Spreadsheet, demonstrating that the Middlebrook Photographs were copied by Getty.

**Christopher Szagola**

127. Christopher Szagola is a named plaintiff and photographer who requested the Firm register photographs on his behalf.

128. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-022-123 with effective date November 14, 2016 (the “123 Registration”). A true and correct copy of the 123 Registration is attached hereto as Exhibit 33, bearing bate-stamp nos. SZA71433-17450.

129. Attached to Szagola’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos., SZA47172-47416, SZA47310-47378 and SZA48123-48125, which are on deposit with the 123 Registration.

130. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-022-131 with effective date November 13, 2016 (the “131 Registration”). A true and correct copy of the 131 Registration is attached hereto as Exhibit 34, bearing bate-stamp nos. SZA17415-17432.

131. Attached to Szagola’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. SZA48409-48532 and SZA 49085-49201, which are on deposit with the 131 Registration.

132. Szagola’s is in possession of a copyright registration certificate, bearing No. VA 2-022-132 with effective date November 13, 2016 (the “132 Registration”). A true and correct copy of the 132 Registration is attached hereto as Exhibit 35, bearing bate-stamp nos. SZA17399-17414.

133. Attached to Szagola’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. SZA48045-48121 and SZA48132-48408 and SZA47173-4722, which are on deposit with the 132 Registration.

134. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-022-144 with effective date November 12, 2016 (the “144 Registration”). A true and correct

copy of the 132 Registration is attached hereto as Exhibit 36, bearing bate-stamp nos.

SZA17073-17086.

135. Attached to Szagola's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SZA47551-48044 and SZA 51512-51537, which are on deposit with the 144 Registration.

136. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-022-146 with effective date November 12, 2016 (the "146 Registration"). A true and correct copy of the 146 Registration is attached hereto as Exhibit 37, bearing bate-stamp nos. SZA17253-17270.

137. Attached to Szagola's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SZA47439-47550, SZA48122, SZA48533-49084, and SZA49590-49655, which are on deposit with the 146 Registration.

138. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-022-147 with effective date November 12, 2016 (the "147 Registration"). A true and correct copy of the 147 Registration is attached hereto as Exhibit 38, bearing bate-stamp nos. SZA17151-17158.

139. Attached to Szagola's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SZA50078-50537, SZA50849-51022 and SZA51538, which are on deposit with the 147 Registration.

140. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-022-149 with effective date November 12, 2016 (the "149 Registration"). A true and correct copy of the 149 Registration is attached hereto as Exhibit 39, bearing bate-stamp nos. SZA17159-17176.

141. Attached to Szagola's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos., SZA49656-50077 and SZA 50572-50848, which are on deposit with the 149 Registration.

142. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-023-699 with effective date November 12, 2016 (the "793 Registration"). A true and correct copy of the 699 Registration is attached hereto as Exhibit 40, bearing bate-stamp nos. SZA17195-17208.

143. Attached to Szagola's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos., SZA47379-47438, SZA50538-50571 and SZA51023-51511, which are on deposit with the 699 Registration.

144. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-022-793 with effective date November 17, 2016 (the "793 Registration"). A true and correct copy of the 699 Registration is attached hereto as Exhibit 41, bearing bate-stamp nos. SZA17349-17364.

145. Attached to Szagola's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SZA48126-48131, which are on deposit with the 793 Registration.

146. Szagola is in possession of a copyright registration certificate, bearing No. VA 2-022-843 with effective date November 14, 2016 (the "843 Registration"). A true and correct copy of the 843 Registration is attached hereto as Exhibit 42, bearing bate-stamp nos. SZA17209-17226.

147. Attached to Szagola's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SZA47223-47309, SZA49202-49589, which are on deposit with the 843 Registration.

148. On the face of the 123 Registration, 131 Registration, 132 Registration, 144 Registration, 146 Registration, 147 Registration, 149 Registration 699 Registration, 793 Registration, 843 Registration (collectively, the "Szagola Registrations"), Szagola is listed as the sole Author and Copyright Claimant of all photographs contained therein.

149. The Firm's registration of the Szagola Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

150. The photographs attached to the Declaration of Christopher Szagola are referred to herein as the "Szagola Photographs".

151. The Firm deposited the Szagola Photographs with the USCO as part of and in connection with the application for the Szagola Registrations.

152. In Exhibit 1-B, the Szagola Photographs are listed and described under # 14159-18677 on the first column of the Getty Spreadsheet, demonstrating that the Szagola Photographs were copied by Getty.

#### **Duncan Williams**

153. Duncan Williams is a named plaintiff and photographer who requested the Firm register photographs on his behalf.

154. Williams is in possession of a copyright registration certificate, bearing No. VA 2-025-256 with effective date November 22, 2016 (the "256 Registration"). A true and correct copy of the 256 Registration is attached hereto as Exhibit 43, bearing bate-stamp nos. WIL05932-5941.

155. Attached to Williams' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. WIL13425-13542, WIL13544-13616 and WIL14461-14584, which are on deposit with the 256 Registration.

156. Williams is in possession of a copyright registration certificate, bearing No. VA 2-025-301 with effective date November 22, 2016 (the "301 Registration"). A true and correct copy of the 301 Registration is attached hereto as Exhibit 44, bearing bate-stamp nos. WIL05982-5999.

157. Attached to Williams' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. WIL12892-12947 and WIL13712-13950, which are on deposit with the 301 Registration.

158. Williams is in possession of a copyright registration certificate, bearing No. VA 2-025-302 with effective date November 22, 2016 (the "302 Registration"). A true and correct copy of the 302 Registration is attached hereto as Exhibit 45, bearing bate-stamp nos. WIL05950-5965.

159. Attached to Williams' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. WIL12851-12891 and WIL13617-13680, which are on deposit with the 302 Registration.

160. Williams is in possession of a copyright registration certificate, bearing No. VA 2-025-304 with effective date November 22, 2016 (the "304 Registration"). A true and correct copy of the 304 Registration is attached hereto as Exhibit 46, bearing bate-stamp nos. WIL06024-6039.

161. Attached to Williams' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. WIL13709-13711, which are on deposit with the 304 Registration.

162. Williams is in possession of a copyright registration certificate, bearing No. VA 2-025-307 with effective date November 22, 2016 (the "307 Registration"). A true and correct copy of the 307 Registration is attached hereto as Exhibit 47, bearing bate-stamp nos. WIL06004-6019.

163. Attached to Williams' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. WIL12741-12850, WIL12948-13235, WIL13681-13708, WIL13951-14133 and WIL14135-14207 which are on deposit with the 307 Registration.

164. Williams is in possession of a copyright registration certificate, bearing No. VA 2-025-308 with effective date November 22, 2016 (the "308 Registration"). A true and correct copy of the 308 Registration is attached hereto as Exhibit 48, bearing bate-stamp nos. WIL05966-5981.

165. Attached to Williams' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. WIL14585-15087 and WIL15343-15547, which are on deposit with the 308 Registration.

166. Williams is in possession of a copyright registration certificate, bearing No. VA 2-038-568 with effective date November 22, 2016 (the "568 Registration"). A true and correct copy of the 568 Registration is attached hereto as Exhibit 49, bearing bate-stamp nos. WIL05916-5931.

167. Attached to Williams' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing date-stamp nos. WIL13236-13424, WIL14208-14460, WIL15088-15164, WIL15342, which are on deposit with the 568 Registration.

168. On the face of the 256 Registration, 301 Registration, 302 Registration, 304 Registration, 307 Registration, 308 Registration, 568 Registration (collectively, the "Williams Registrations"), Williams is listed as the sole Author and Copyright Claimant of all photographs contained therein.

169. The Firm's registration of the Williams Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

170. The photographs attached to the Declaration of Duncan Williams are referred to herein as the "Williams Photographs".

171. The Firm deposited the Williams Photographs with the USCO as part of and in connection with the application for the Williams Registrations.

172. In Exhibit 1-B, the Williams Photographs are listed and described under # 21101-24014 on the first column of the Getty Spreadsheet, demonstrating that the Williams Photographs were copied by Getty.

## **PART TWO: ZUMA'S EXCLUSIVE PHOTOGRAPHERS**

### **Altaf Zargar**

173. Altaf Zargar is a photographer who has an exclusive licensing agreement with Zuma.

174. Zuma requested that the Firm register photographs on Zargar's behalf.

175. Zargar is in possession of a copyright registration certificate, bearing No. VA 2-025-227 with effective date November 23, 2016 (the "227" Registration). A true and correct

copy of the 227 Registration is attached hereto as Exhibit 50, bearing bate-stamp nos.

ZAR00009-16.

176. Attached to Zargar's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ZAR00018-29, which are on deposit with the 227 Registration (the "Zargar Photographs").

177. On the face of the 227 Registration (the "Zargar Registration"), Altaf Zargar is listed as the Author and Copyright Claimant of all photographs contained therein

178. The Firm's registration of the Zargar Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

179. The Firm deposited the Zargar Photographs with the USCO as part of and in connection with the application for the Zargar Registration.

180. In Exhibit 1-B, the Zargar Photographs are listed and described under # 657-668 on the first column of the Getty Spreadsheet, demonstrating that the Zargar Photographs were copied by Getty.

**Andrew Gyopar**

181. Andrew Gyopar is a photographer who has an exclusive licensing agreement with Zuma.

182. Zuma requested that the Firm register photographs on Gyopar's behalf.

183. Gyopar is in possession of a copyright registration certificate, bearing No. VA 2-031-723 with effective date November 21, 2016 (the "723" Registration). A true and correct copy of the 723 Registration is attached hereto as Exhibit 51, bearing bate-stamp nos. GYOP00017-20.

184. Attached to Gyopar’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. GYOP00018-81, which are on deposit with the 723 Registration.

185. Gyopar is in possession of a copyright registration certificate, bearing No. VA 2-031-726 with effective date November 21, 2016 (the “726” Registration). A true and correct copy of the 227 Registration is attached hereto as Exhibit 52, bearing bate-stamp nos. GYOP00005-16.

186. Attached to Gyopar’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. GYOP00082-101 which are on deposit with the 726 Registration.

187. On the face of the 723 Registration and 726 Registration (the “Gyopar Registrations”), Andrew Gyopar is listed as the Author and Copyright Claimant of all photographs contained therein.

188. The Firm’s registration of the Gyopar Registrations was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

189. The photographs attached to the Declaration of Andrew Gyopar are referred to herein as the “Gyopar Photographs”.

190. The Firm deposited the Gyopar Photographs with the USCO as part of and in connection with the application for the Gyopar Registrations.

191. In Exhibit 1-B, the Gyopar Photographs are listed and described under # 1943-2030 on the first column of the Getty Spreadsheet, demonstrating that the Gyopar Photographs were actually copied by Getty and displayed on Getty’s website.

**Aristidis Vafeiadakis**

192. Aristidis Vafeiadakis is a photographer who has an exclusive licensing agreement with Zuma.

193. Zuma requested that the Firm register photographs on Vafeiadakis's behalf.

194. Vafeiadakis is in possession of a copyright registration certificate, bearing No. VA 2-038-466 with effective date November 23, 2016 (the "466" Registration). A true and correct copy of the 466 Registration is attached hereto as Exhibit 53, bearing bate-stamp nos. VAD00369-466.

195. Attached to Vafeiadakis's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. VAD00388-606, which are on deposit with the 466 Registration (the "Vafeiadakis Photographs").

196. On the face of the 466 Registration (the "Vafeiadakis Registration"), Aristidis Vafeiadakis is listed as the Author and Copyright Claimant of all photographs contained therein

197. The Firm's registration of the Vafeiadakis Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

198. The Firm deposited the Vafeiadakis Photographs with the USCO as part of and in connection with the application for the Vafeiadakis Registration.

199. In Exhibit 1-B, the Vafeiadakis Photographs are listed and described under # 3680-3902 on the first column of the Getty Spreadsheet, demonstrating that the Vafeiadakis Photographs were copied by Getty.

**Brian Cahn**

200. Brian Cahn is a photographer who has an exclusive licensing agreement with Zuma.

201. Zuma requested that the Firm register photographs on Cahn's behalf.

202. Cahn is in possession of a copyright registration certificate, bearing No. VA 2-032-189 with effective date November 3, 2016 (the “189” Registration). A true and correct copy of the 189 Registration is attached hereto as Exhibit 54, bearing bate-stamp nos. CAHN00009-24.

203. Attached to Cahn’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. CAHN00046-48, which are on deposit with the 189 Registration (the “Cahn Photographs”).

204. On the face of the 189 Registration (the “Cahn Registration”), Brian Cahn is listed as the Author and Copyright Claimant of all photographs contained therein

205. The Firm’s registration of the Cahn Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

206. The Firm deposited the Cahn Photographs with the USCO as part of and in connection with the application for the Cahn Registration.

207. In Exhibit 1-B, the Cahn Photographs are listed and described under # 12207-12209 on the first column of the Getty Spreadsheet, demonstrating that the Cahn Photographs were copied by Getty.

**Bryan Smith**

208. Bryan Smith is a photographer who has an exclusive licensing agreement with Zuma.

209. Zuma requested that the Firm register photographs on Smith’s behalf.

210. Smith is in possession of a copyright registration certificate, bearing No. VA 2-023-595 with effective date November 10, 2016 (the “595” Registration). A true and correct

copy of the 595 Registration is attached hereto as Exhibit 55, bearing bate-stamp nos.

SMIT00062-75.

211. Attached to Smith's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SMIT00487-488, which are on deposit with the 595 Registration.

212. Smith is in possession of a copyright registration certificate, bearing No. VA 2-023-719 with effective date November 9, 2016 (the "719" Registration). A true and correct copy of the 719 Registration is attached hereto as Exhibit 56, bearing bate-stamp nos. SMIT00024-39.

213. Attached to Smith's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SMIT00089-486 and SMIT00489-636, which are on deposit with the 719 Registration.

214. Smith is in possession of a copyright registration certificate, bearing No. VA 2-031-734 with effective date November 2, 2016 (the "734" Registration). A true and correct copy of the 734 Registration is attached hereto as Exhibit 57, bearing bate-stamp nos. SMIT00046-61.

215. Attached to Smith's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SMIT00637-708, which are on deposit with the 734 Registration.

216. On the face of the 595 Registration, 719 Registration, and 734 Registration (collectively, the "Smith Registrations"), Bryan Smith is listed as the Author and Copyright Claimant of all photographs contained therein.

217. The Firm's registration of the Smith Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO

218. The photographs attached to the Declaration of Bryan Smith are referred to herein as the “Smith Photographs”.

219. The Firm deposited the Smith Photographs with the USCO as part of and in connection with the application for the Smith Registrations.

220. In Exhibit 1-B, the Smith Photographs are listed and described under # 12263-12895 on the first column of the Getty Spreadsheet, demonstrating that the Smith Photographs were copied by Getty.

**Craig Durling**

221. Craig Durling is a photographer who has an exclusive licensing agreement with Zuma.

222. Zuma requested that the Firm register photographs on Durling’s behalf

223. Durling is in possession of a copyright registration certificate, bearing No. VA 2-023-682 with effective date November 14, 2016 (the “682 Registration”). A true and correct copy of the 682 Registration is attached hereto as Exhibit 58, bearing bate-stamp nos. DURL0009-16.

224. Attached to Durling’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. DURL00018-19, which are on deposit with the 682 Registration (the “Durling Photographs”)

225. On the face of the 682 Registration (the “Durling Registration”), Craig Durling is listed as the Author and Copyright Claimant of all photographs contained therein.

226. The Firm’s registration of the Durling Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

227. The Firm deposited the Durling Photographs with the USCO as part of and in connection with the application for the Durling Registration.

228. In Exhibit 1-B, the Durling Photographs are listed and described under # 18710-18711 on the first column of the Getty Spreadsheet, demonstrating that the Durling Photographs were copied by Getty.

**Dan Anderson**

229. Dan Anderson is a photographer who has an exclusive licensing agreement with Zuma.

230. Zuma requested that the Firm register photographs on Anderson's behalf

231. Anderson is in possession of a copyright registration certificate, bearing No. VA 2-031-668 with effective date November 4, 2016 (the "668 Registration"). A true and correct copy of the 040 Registration is attached hereto as Exhibit 59, bearing bate-stamp nos. AND0020-25.

232. Attached to Anderson's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. AND00027-34, which are on deposit with the 668 Registration (the "Anderson Photographs")

233. On the face of the 668 Registration (the "Anderson Registration"), Dan Anderson is listed as the Author and Copyright Claimant of all photographs contained therein.

234. The Firm's registration of the Anderson Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

235. The Firm deposited the Anderson Photographs with the USCO as part of and in connection with the application for the Anderson Registration.

236. In Exhibit 1-B, the Anderson Photographs are listed and described under # 20530-20537 on the first column of the Getty Spreadsheet, demonstrating that the Anderson Photographs were copied by Getty.

**David Becker**

237. David Becker is a photographer who has an exclusive licensing agreement with Zuma.

238. Zuma requested that the Firm register photographs on Becker's behalf.

239. Becker is in possession of a copyright registration certificate, bearing No. VA 2-032-048 with effective date November 4, 2016 (the "048" Registration). A true and correct copy of the 048 Registration is attached hereto as Exhibit 60, bearing bate-stamp nos. BECK0009-12.

240. Attached to Becker's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BECK00028-58, which are on deposit with the 048 Registration.

241. Becker is in possession of a copyright registration certificate, bearing No. VA 2-031-660 with effective date November 4, 2016 (the "660" Registration). A true and correct copy of the 660 Registration is attached hereto as Exhibit 61, bearing bate-stamp nos. BECK00013-18.

242. Attached to Becker's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BECK00059-140, which are on deposit with the 660 Registration.

243. On the face of the 048 Registration and 660 Registration (the "Becker Registrations"), David Becker is listed as the Author and Copyright Claimant of all photographs contained therein.

244. The Firm's registration of the Becker Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

245. The photographs attached to the Declaration of David Becker are referred to herein as the "Becker Photographs".

246. The Firm deposited the Becker Photographs with the USCO as part of and in connection with the application for the Becker Registrations.

247. In Exhibit 1-B, the Becker Photographs are listed and described under # 20544-20657 on the first column of the Getty Spreadsheet, demonstrating that the Becker Photographs were copied by Getty.

**David Bukach**

248. David Bukach is a photographer who has an exclusive licensing agreement with Zuma.

249. Zuma requested that the Firm register photographs on Bukach's behalf

250. Bukach is in possession of a copyright registration certificate, bearing No. VA 2-023-290 with effective date November 3, 2016 (the "290 Registration"). A true and correct copy of the 290 Registration is attached hereto as Exhibit 62, bearing bate-stamp nos. BUKA00005-12.

251. Attached to Bukach's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BUKA00014-15, which are on deposit with the 290 Registration (the "Bukach Photographs")

252. On the face of the 290 Registration (the "Bukach Registration"), David Bukach is listed as the Author and Copyright Claimant of all photographs contained therein.

253. The Firm's registration of the Bukach Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

254. The Firm deposited the Bukach Photographs with the USCO as part of and in connection with the application for the Bukach Registration.

255. In Exhibit 1-B, the Bukach Photographs are listed and described under # 20658-20569 on the first column of the Getty Spreadsheet, demonstrating that the Bukach Photographs were copied by Getty.

**Erik Lesser**

256. Erik Lesser is a photographer who has an exclusive licensing agreement with Zuma.

257. Zuma requested that the Firm register photographs on Lesser's behalf

258. Lesser is in possession of a copyright registration certificate, bearing No. VA 2-023-414 with effective date November 15, 2016 (the "414 Registration"). A true and correct copy of the 414 Registration is attached hereto as Exhibit 63, bearing bate-stamp nos. LESS00033-42.

259. Attached to Lesser's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. LESS00044-92, which are on deposit with the 414 Registration (the "Lesser Photographs")

260. On the face of the 414 Registration (the "Lesser Registration"), Erik Lesser is listed as the Author and Copyright Claimant of all photographs contained therein.

261. The Firm's registration of the Lesser Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

262. The Firm deposited the Lesser Photographs with the USCO as part of and in connection with the application for the Lesser Registration.

263. In Exhibit 1-B, the Lesser Photographs are listed and described under # 24015-24068 on the first column of the Getty Spreadsheet, demonstrating that the Lesser Photographs were copied by Getty.

**Gary Dwight Miller**

264. Gary Dwight Miller is a photographer who has an exclusive licensing agreement with Zuma.

265. Zuma requested that the Firm register photographs on Miller's behalf

266. Miller is in possession of a copyright registration certificate, bearing No. VA 2-023-663 with effective date November 14, 2016 (the "663 Registration"). A true and correct copy of the 663 Registration is attached hereto as Exhibit 64, bearing bate-stamp nos. MILL00004-17.

267. Attached to Miller's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. MILL00009-11, which are on deposit with the 663 Registration (the "Lesser Photographs")

268. On the face of the 663 Registration (the "Miller Registration"), Gary Dwight Miller is listed as the Author and Copyright Claimant of all photographs contained therein.

269. The Firm's registration of the Miller Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

270. The Firm deposited the Miller Photographs with the USCO as part of and in connection with the application for the Miller Registration.

271. In Exhibit 1-B, the Miller Photographs are listed and described under # 24070-24071 on the first column of the Getty Spreadsheet, demonstrating that the Miller Photographs were copied by Getty.

**Hector Acevedo**

272. Hector Acevedo is a photographer who has an exclusive licensing agreement with Zuma.

273. Zuma requested that the Firm register photographs on Acevedo's behalf.

274. Acevedo is in possession of a copyright registration certificate, bearing No. VA 2-023-285 with effective date November 3, 2016 (the "285" Registration). A true and correct copy of the 048 Registration is attached hereto as Exhibit 65, bearing bate-stamp nos. ACE0021-34.

275. Attached to Acevedo's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACE00042-45 and ACE00047-233, which are on deposit with the 285 Registration.

276. Acevedo is in possession of a copyright registration certificate, bearing No. VA 2-031-416 with effective date November 28, 2016 (the "416" Registration). A true and correct copy of the 416 Registration is attached hereto as Exhibit 66, bearing bate-stamp nos. ACE00005-12.

277. Attached to Acevedo's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACE00046 and ACE00234-320, which are on deposit with the 416 Registration.

278. On the face of the 285 Registration and 416 Registration (collectively, the "Acevedo Registrations"), Hector Acevedo is listed as the Author and Copyright Claimant of all photographs contained therein.

279. The Firm's registration of the Acevedo Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

280. The photographs attached to the Declaration of Hector Acevedo are referred to herein as the "Acevedo Photographs".

281. The Firm deposited the Acevedo Photographs with the USCO as part of and in connection with the application for the Acevedo Registrations.

282. In Exhibit 1-B, the Acevedo Photographs are listed and described under # 25307-25631 on the first column of the Getty Spreadsheet, demonstrating that the Acevedo Photographs were copied by Getty.

**Howard Sayer**

283. Howard Sayer is a photographer who has an exclusive licensing agreement with Zuma.

284. Zuma requested that the Firm register photographs on Sayer's behalf

285. Sayer is in possession of a copyright registration certificate, bearing No. VA 2-023-396 with effective date November 15, 2016 (the "396 Registration"). A true and correct copy of the 396 Registration is attached hereto as Exhibit 67, bearing bate-stamp nos. SAY00011-14.

286. Attached to Sayer's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp nos. SAY00016, which is on deposit with the 396 Registration (the "Sayer Photograph")

287. On the face of the 396 Registration (the "Sayer Registration"), Howard Sayer is listed as the Author and Copyright Claimant of all photographs contained therein.

288. The Firm's registration of the Sayer Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

289. The Firm deposited the Sayer Photographs with the USCO as part of and in connection with the application for the Sayer Registration.

290. In Exhibit 1-B, the Sayer Photograph is listed and described under # 25632 on the first column of the Getty Spreadsheet, demonstrating that the Sayer Photograph was copied by Getty.

**Jason Moore**

291. Jason Moore is a photographer who has an exclusive licensing agreement with Zuma.

292. Zuma requested that the Firm register photographs on Moore's behalf.

293. Moore is in possession of a copyright registration certificate, bearing No. VA 2-022-373 with effective date October 31, 2016 (the "373" Registration). A true and correct copy of the 373 Registration is attached hereto as Exhibit 68, bearing bate-stamp nos. MOOR02973-2984.

294. Attached to Moore's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. MOOR03132-3367, which are on deposit with the 373 Registration.

295. Moore is in possession of a copyright registration certificate, bearing No. VA 2-031-691 with effective date October 31, 2016 (the "691" Registration). A true and correct copy of the 691 Registration is attached hereto as Exhibit 69, bearing bate-stamp nos. MOOR02985-2994.

296. Attached to Moore's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. MOOR03024-3131, which are on deposit with the 691 Registration.

297. On the face of the 373 Registration and 691 Registration (collectively, the "Moore Registrations"), Jason Moore is listed as the Author and Copyright Claimant of all photographs contained therein.

298. The Firm's registration of the Moore Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

299. The photographs attached to the Declaration of Jason Moore are referred to herein as the "Moore Photographs".

300. The Firm deposited the Moore Photographs with the USCO as part of and in connection with the application for the Moore Registrations.

301. In Exhibit 1-B, the Moore Photographs are listed and described under # 25636-25983 on the first column of the Getty Spreadsheet, demonstrating that the Moore Photographs were copied by Getty.

**Jed Conklin**

302. Jed Conklin is a photographer who has an exclusive licensing agreement with Zuma.

303. Zuma requested that the Firm register photographs on Conklin's behalf.

304. Conklin is in possession of a copyright registration certificate, bearing No. VA 2-032-070 with effective date November 1, 2016 (the "070 Registration"). A true and correct copy of the 070 Registration is attached hereto as Exhibit 70, bearing bate-stamp nos. CONK00923-926.

305. Attached to Conklin's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos., CONK00650-820, CONK00826-854 and CONK00856-894, which are on deposit with the 070 Registration.

306. Conklin is in possession of a copyright registration certificate, bearing No. VA 2-032-211 with effective date November 1, 2016 (the "211 Registration"). A true and correct copy of the 211 Registration is attached hereto as Exhibit 71, bearing bate-stamp nos. CONK00553-538.

307. Attached to Conklin's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. CONK00855 and CONK00895-901, which are on deposit with the 211 Registration.

308. Conklin is in possession of a copyright registration certificate, bearing No. VA 2-031-685 with effective date October 31, 2016 (the "685 Registration"). A true and correct copy of the 685 Registration is attached hereto as Exhibit 72, bearing bate-stamp nos. CONK00539-542.

309. Attached to Conklin's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp no. CONK00915, which is on deposit with the 685 Registration.

310. Conklin is in possession of a copyright registration certificate, bearing No. VA 2-031-686 with effective date October 31, 2016 (the "686 Registration"). A true and correct copy of the 686 Registration is attached hereto as Exhibit 73, bearing bate-stamp nos. CONK00525-528.

311. Attached to Conklin's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp no. CONK00916, which is on deposit with the 686 Registration.

312. Conklin is in possession of a copyright registration certificate, bearing No. VA 2-031-698 with effective date October 31, 2016 (the "698 Registration"). A true and correct copy of the 698 Registration is attached hereto as Exhibit 74, bearing bate-stamp nos. CONK00529-532.

313. Attached to Conklin's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. CONK00902-914, which are on deposit with the 698 Registration.

314. Conklin is in possession of a copyright registration certificate, bearing No. VA 2-022-876 with effective date November 1, 2016 (the "876 Registration"). A true and correct copy of the 876 Registration is attached hereto as Exhibit 75, bearing bate-stamp nos. CONK00918-922.

315. Attached to Conklin's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. CONK00544-649, which are on deposit with the 876 Registration.

316. On the face of the 070 Registration, 211 Registration, 685 Registration, 686 Registration, 698 Registration, and 876 Registration (collectively, the "Conklin Registrations"), Jed Conklin is listed as the Author and Copyright Claimant of all photographs contained therein.

317. The Firm's registration of the Conklin Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

318. The photographs attached to the Declaration of Jed Conklin are referred to herein as the “Conklin Photographs”.

319. The Firm deposited the Conklin Photographs with the USCO as part of and in connection with the application for the Conklin Registrations.

320. In Exhibit 1-B, the Conklin Photographs are listed and described under # 27314-27688 on the first column of the Getty Spreadsheet, demonstrating that the Conklin Photographs were copied by Getty.

**Jeffrey Geller**

321. Jeffrey Geller is a photographer who has an exclusive licensing agreement with Zuma.

322. Zuma requested that the Firm register photographs on Geller’s behalf.

323. Geller is in possession of a copyright registration certificate, bearing No. VA 3-032-001 with effective date November 7, 2016 (the “001” Registration). A true and correct copy of the 001 Registration is attached hereto as Exhibit 76, bearing bate-stamp nos. GELL00052-61.

324. Attached to Geller’s declaration in support of Plaintiffs’ motion for partial summary judgment is a photograph bearing bate-stamp no. GELL00042, which is on deposit with the 001 Registration.

325. Geller is in possession of a copyright registration certificate, bearing No. VA 2-022-659 with effective date November 7, 2016 (the “659” Registration). A true and correct copy of the 659 Registration is attached hereto as Exhibit 77, bearing bate-stamp nos. GELL00002-13.

326. Attached to Geller's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp no. GELL00041, which is on deposit with the 659 Registration.

327. On the face of the 001 Registration and 659 Registration (collectively, the "Geller Registrations"), Jeffrey Geller is listed as the Author and Copyright Claimant of all photographs contained therein.

328. The Firm's registration of the Geller Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

329. The photographs attached to the Declaration of Jeffrey Geller are referred to herein as the "Geller Photographs".

330. The Firm deposited the Geller Photographs with the USCO as part of and in connection with the application for the Geller Registrations.

331. In Exhibit 1-B, the Geller Photographs are listed and described under # 276691-27692 on the first column of the Getty Spreadsheet, demonstrating that the Geller Photographs were copied by Getty.

**Jeremy Breningstall**

332. Jeremy Breningstall is a photographer who has an exclusive licensing agreement with Zuma.

333. Zuma requested that the Firm register photographs on Breningstall's behalf.

334. Breningstall is in possession of a copyright registration certificate, bearing No. VA 2-022-195 with effective date November 9, 2016 (the "195 Registration"). A true and correct copy of the 195 Registration is attached hereto as Exhibit 78, bearing bate-stamp nos. BREN00068-71.

335. Attached to Breningstall's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. BREN00058-60, which are on deposit with the 001 Registration.

336. Breningstall is in possession of a copyright registration certificate, bearing No. VA 2-022-852 with effective date November 10, 2016 (the "852 Registration"). A true and correct copy of the 852 Registration is attached hereto as Exhibit 79, bearing bate-stamp nos. BREN00005-20.

337. Attached to Breningstall's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. BREN00061-66, which are on deposit with the 852 Registration.

338. On the face of the 195 Registration and 852 Registration (collectively, the "Breningstall Registrations"), Jeremy Breningstall is listed as the Author and Copyright Claimant of all photographs contained therein.

339. The Firm's registration of the Breningstall Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

340. The photographs attached to the Declaration of Jeremey Breningstall are referred to herein as the "Geller Photographs".

341. The Firm deposited the Breningstall Photographs with the USCO as part of and in connection with the application for the Breningstall Registrations.

342. In Exhibit 1-B, the Breningstall Photographs are listed and described under # 27693-27701 on the first column of the Getty Spreadsheet, demonstrating that the Breningstall Photographs were copied by Getty.

**Jim Dedmon**

343. Jim Dedmon is a photographer who has an exclusive licensing agreement with Zuma.

344. Zuma requested that the Firm register photographs on Dedmon's behalf.

345. Dedmon is in possession of a copyright registration certificate, bearing No. VA 2-025-236 with effective date November 23, 2016 (the "236 Registration"). A true and correct copy of the 236 Registration is attached hereto as Exhibit 80, bearing bate-stamp nos. DED00027-40.

346. Attached to Dedmon's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp no. DED00042, which is on deposit with the 236 Registration.

347. Dedmon is in possession of a copyright registration certificate, bearing No. VA 2-025-237 with effective date November 23, 2016 (the "237 Registration"). A true and correct copy of the 237 Registration is attached hereto as Exhibit 81, bearing bate-stamp nos. DED00005-16.

348. Attached to Dedmon's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp no. DED00043, which is on deposit with the 237 Registration.

349. On the face of the 236 Registration and 237 Registration (collectively, the "Dedmon Registrations"), Jim Dedmon is listed as the Author and Copyright Claimant of all photographs contained therein.

350. The Firm's registration of the Dedmon Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

351. The photographs attached to the Declaration of Jim Dedmon are referred to herein as the “Dedmon Photographs”.

352. The Firm deposited the Dedmon Photographs with the USCO as part of and in connection with the application for the Dedmon Registrations.

353. In Exhibit 1-B, the Dedmon Photographs are listed and described under # 27702-27733 on the first column of the Getty Spreadsheet, demonstrating that the Dedmon Photographs were copied by Getty.

**Jonathan Alcorn**

354. Jonathan Alcorn is a photographer who has an exclusive licensing agreement with Zuma.

355. Zuma requested that the Firm register photographs on Alcorn’s behalf

356. Alcorn is in possession of a copyright registration certificate, bearing No. VA 2-022-387 with effective date November 3, 2016 (the “387 Registration”). A true and correct copy of the 387 Registration is attached hereto as Exhibit 82, bearing bate-stamp nos. ALC00029-34.

357. Attached to Alcorn’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ALC00060-106, which are on deposit with the 387 Registration (the “Alcorn Photographs”)

358. On the face of the 387 Registration (the “Alcorn Registration”), Jonathan Alcorn is listed as the Author and Copyright Claimant of all photographs contained therein.

359. The Firm’s registration of the Alcorn Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

360. The Firm deposited the Alcorn Photographs with the USCO as part of and in connection with the application for the Alcorn Registration.

361. In Exhibit 1-B, the Alcorn Photograph is listed and described under # 31798-31846 on the first column of the Getty Spreadsheet, demonstrating that the Alcorn Photographs were copied by Getty.

**Mark Bialek**

362. Mark Bialek is a photographer who has an exclusive licensing agreement with Zuma.

363. Zuma requested that the Firm register photographs on Bialek's behalf.

364. Bialek is in possession of a copyright registration certificate, bearing No. VA 2-022-217 with effective date November 4, 2016 (the "217 Registration"). A true and correct copy of the 217 Registration is attached hereto as Exhibit 83, bearing bate-stamp nos. BIAL00005-8.

365. Attached to Bialek's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. BIAL00025-32, which are on deposit with the 217 Registration.

366. Bialek is in possession of a copyright registration certificate, bearing No. VA 2-022-238 with effective date November 2, 2016 (the "238 Registration"). A true and correct copy of the 238 Registration is attached hereto as Exhibit 84, bearing bate-stamp nos. BIAL00009-12.

367. Attached to Bialek's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. BIAL00018-24, which are on deposit with the 238 Registration.

368. On the face of the 217 Registration and 238 Registration (collectively, the "Bialek Registrations"), Mark Bialek is listed as the Author and Copyright Claimant of all photographs contained therein.

369. The Firm's registration of the Bialek Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

370. The photographs attached to the Declaration of Mark Bialek are referred to herein as the "Geller Photographs".

371. The Firm deposited the Bialek Photographs with the USCO as part of and in connection with the application for the Bialek Registrations.

372. In Exhibit 1-B, the Bialek Photographs are listed and described under # 40953-40967 on the first column of the Getty Spreadsheet, demonstrating that the Bialek Photographs were copied by Getty.

### **Mark Makela**

373. Mark Makela is a photographer who has an exclusive licensing agreement with Zuma.

374. Zuma requested that the Firm register photographs on Makela's behalf.

375. Makela is in possession of a copyright registration certificate, bearing No. VA 2-022-641 with effective date November 7, 2016 (the "641 Registration"). A true and correct copy of the 641 Registration is attached hereto as Exhibit 85, bearing bate-stamp nos. MAKE00011-16.

376. Attached to Makela's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp no. MAKE00018, which is on deposit with the 641 Registration.

377. Makela is in possession of a copyright registration certificate, bearing No. VA 2-022-642 with effective date November 17, 2016 (the "642 Registration"). A true and correct copy of the 642 Registration is attached hereto as Exhibit 86, bearing bate-stamp nos.

MAKE00021-23.

378. Attached to Makela's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. MAKE00019, which are on deposit with the 642 Registration.

379. On the face of the 641 Registration and 642 Registration (collectively, the "Makela Registrations"), Mark Makela is listed as the Author and Copyright Claimant of all photographs contained therein.

380. The Firm's registration of the Makela Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

381. The photographs attached to the Declaration of Mark Makela are referred to herein as the "Makela Photographs".

382. The Firm deposited the Makela Photographs with the USCO as part of and in connection with the application for the Makela Registrations.

383. In Exhibit 1-B, the Makela Photographs are listed and described under # 40970-40971 on the first column of the Getty Spreadsheet, demonstrating that the Makela Photographs were copied by Getty.

### **Mark Sobhani**

384. Mark Sobhani is a photographer who has an exclusive licensing agreement with Zuma.

385. Zuma requested that the Firm register photographs on Sobhani's behalf

386. Sobhani is in possession of a copyright registration certificate, bearing No. VA 2-032-169 with effective date November 1, 2016 (the "169 Registration"). A true and correct copy of the 169 Registration is attached hereto as Exhibit 87, bearing bate-stamp nos. SOBH00005-10.

387. Attached to Sobhani's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. SOBH00022-132, which are on deposit with the 169 Registration (the "Alcorn Photographs")

388. On the face of the 169 Registration (the "Sobhani Registration"), Mark Sobhani is listed as the Author and Copyright Claimant of all photographs contained therein.

389. The Firm's registration of the Sobhani Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

390. The Firm deposited the Sobhani Photographs with the USCO as part of and in connection with the application for the Sobhani Registration.

391. In Exhibit 1-B, the Sobhani Photograph is listed and described under # 11399-11509 on the first column of the Getty Spreadsheet, demonstrating that the Sobhani Photographs were copied by Getty.

### **Marty Bicek**

392. Marty Bicek is a photographer who has an exclusive licensing agreement with Zuma.

393. Zuma requested that the Firm register photographs on Bicek's behalf

394. Bicek is in possession of a copyright registration certificate, bearing No. VA 2-023-040 with effective date November 15, 2016 (the "040 Registration"). A true and correct copy of the 040 Registration is attached hereto as Exhibit 88, bearing bate-stamp nos. BICE00004-7.

395. Attached to Bicek's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BICE00015-40, which are on deposit with the 040 Registration (the "Bicek Photographs")

396. On the face of the 040 Registration (the “Bicek Registration”), Marty Bicek is listed as the Author and Copyright Claimant of all photographs contained therein.

397. The Firm’s registration of the Bicek Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

398. The Firm deposited the Bicek Photographs with the USCO as part of and in connection with the application for the Bicek Registration.

399. In Exhibit 1-B, the Bicek Photograph is listed and described under # 40972-40998 on the first column of the Getty Spreadsheet, demonstrating that the Bicek Photographs were copied by Getty.

### **Mary Calvert**

400. Mary Calvert is a photographer who has an exclusive licensing agreement with Zuma.

401. Zuma requested that the Firm register photographs on Calvert’s behalf

402. Calvert is in possession of a copyright registration certificate, bearing No. VA 2-023-044 with effective date November 15, 2016 (the “044 Registration”). A true and correct copy of the 040 Registration is attached hereto as Exhibit 89, bearing bate-stamp nos. CALV00011-16.

403. Attached to Calvert’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. CALV00022-92, which are on deposit with the 044 Registration (the “Calvert Photographs”)

404. On the face of the 044 Registration (the “Calvert Registration”), Mary Calvert is listed as the Author and Copyright Claimant of all photographs contained therein.

405. The Firm's registration of the Calvert Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

406. The Firm deposited the Calvert Photographs with the USCO as part of and in connection with the application for the Calvert Registration.

407. In Exhibit 1-B, the Calvert Photograph is listed and described under # 40999-41069 on the first column of the Getty Spreadsheet, demonstrating that the Calvert Photographs were copied by Getty.

**Matt Roberts**

408. Matt Roberts is a photographer who has an exclusive licensing agreement with Zuma.

409. Zuma requested that the Firm register photographs on Roberts' behalf

410. Roberts is in possession of a copyright registration certificate, bearing No. VA 2-022-425 with effective date November 16, 2016 (the "425 Registration"). A true and correct copy of the 425 Registration is attached hereto as Exhibit 90, bearing bate-stamp nos. ROB00014-19.

411. Attached to Roberts's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp nos. ROB00021, which is on deposit with the 044 Registration (the "Roberts Photograph")

412. On the face of the 425 Registration (the "Roberts Registration"), Matt Roberts is listed as the Author and Copyright Claimant of all photographs contained therein.

413. The Firm's registration of the Roberts Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

414. The Firm deposited the Roberts Photograph with the USCO as part of and in connection with the application for the Roberts Registration.

415. In Exhibit 1-B, the Roberts Photograph is listed and described under # 41070 on the first column of the Getty Spreadsheet, demonstrating that the Roberts Photograph was copied by Getty.

**Mike Fuentes**

416. Mike Fuentes is a photographer who has an exclusive licensing agreement with Zuma.

417. Zuma requested that the Firm register photographs on Fuentes's behalf

418. Fuentes is in possession of a copyright registration certificate, bearing No. VA 2-022-853 with effective date November 7, 2016 (the "853 Registration"). A true and correct copy of the 853 Registration is attached hereto as Exhibit 91, bearing bate-stamp nos. FUEN00005-8.

419. Attached to Fuentes' declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. FUEN00010-26, which are on deposit with the 853 Registration (the "Fuentes Photographs")

420. On the face of the 853 Registration (the "Fuentes Registration"), Mike Fuentes is listed as the Author and Copyright Claimant of all photographs contained therein.

421. The Firm's registration of the Fuentes Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

422. The Firm deposited the Fuentes Photographs with the USCO as part of and in connection with the application for the Calvert Registration.

423. In Exhibit 1-B, the Fuentes Photographs are listed and described under # 41071-41087 on the first column of the Getty Spreadsheet, demonstrating that the Calvert Photographs were copied.

**Paul Kitagaki**

424. Paul Kitagaki is a photographer who has an exclusive licensing agreement with Zuma.

425. Zuma requested that the Firm register photographs on Kitagaki's behalf.

426. Kitagaki is in possession of a copyright registration certificate, bearing No. VA 2-023-078 with effective date November 8, 2016 (the "078 Registration"). A true and correct copy of the 078 Registration is attached hereto as Exhibit 92, bearing bate-stamp nos. KITA00052-65.

427. Attached to Kitagaki's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. KITA00026-37, which are on deposit with the 078 Registration.

428. Kitagaki is in possession of a copyright registration certificate, bearing No. VA 2-023-090 with effective date November 8, 2016 (the "090 Registration"). A true and correct copy of the 090 Registration is attached hereto as Exhibit 93, bearing bate-stamp nos. KITA00009-24.

429. Attached to Kitagaki's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. KITA00038-51, which are on deposit with the 090 Registration.

430. On the face of the 078 Registration and 090 Registration (collectively, the "Kitagaki Registrations"), Paul Kitagaki is listed as the Author and Copyright Claimant of all photographs contained therein.

431. The Firm's registration of the Kitagaki Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

432. The photographs attached to the Declaration of Paul Kitagaki are referred to herein as the "Kitagaki Photographs".

433. The Firm deposited the Kitagaki Photographs with the USCO as part of and in connection with the application for the Kitagaki Registrations.

434. In Exhibit 1-B, the Kitagaki Photographs are listed and described under # 41991-42016 on the first column of the Getty Spreadsheet, demonstrating that the Kitagaki Photographs were copied by Getty.

**Pete Marovich**

435. Pete Marovich is a photographer who has an exclusive licensing agreement with Zuma.

436. Zuma requested that the Firm register photographs on Marovich's behalf.

437. Marovich is in possession of a copyright registration certificate, bearing No. VA 2-080-284 with effective date December 26, 2017 (the "284 Registration"). A true and correct copy of the 284 Registration is attached hereto as Exhibit 94, bearing bate-stamp nos. MARO00074-77.

438. Attached to Marovich's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. MARO00025-54, which are on deposit with the 284 Registration.

439. Marovich is in possession of a copyright registration certificate, bearing No. VA 2-080-286 with effective date December 26, 2017 (the "286 Registration"). A true and correct copy of the 286 Registration is attached hereto as Exhibit 95, bearing bate-stamp nos.

MARO00078-81.

440. Attached to Marovich's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. MARO00055-72, which are on deposit with the 286 Registration.

441. On the face of the 284 Registration and 286 Registration (collectively, the "Marovich Registrations"), Pete Marovich is listed as the Author and Copyright Claimant of all photographs contained therein.

442. The Firm's registration of the Marovich Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

443. The photographs attached to the Declaration of Pete Marovich are referred to herein as the "Marovich Photographs".

444. The Firm deposited the Marovich Photographs with the USCO as part of and in connection with the application for the Marovich Registrations.

445. In Exhibit 1-B, the Marovich Photographs are listed and described under # 42017-42082 on the first column of the Getty Spreadsheet, demonstrating that the Marovich Photographs were copied by Getty.

**Ralph Lauer**

446. Ralph Lauer is a photographer who has an exclusive licensing agreement with Zuma.

447. Zuma requested that the Firm register photographs on Lauer's behalf.

448. Lauer is in possession of a copyright registration certificate, bearing No. VA 2-022-857 with effective date November 8, 2016 (the "857 Registration"). A true and correct copy of the 857 Registration is attached hereto as Exhibit 96, bearing bate-stamp nos. LAU00037-48.

449. Attached to Lauer's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. LAU000269-452, which are on deposit with the 857 Registration.

450. Lauer is in possession of a copyright registration certificate, bearing No. VA 2-022-860 with effective date November 8, 2016 (the "860 Registration"). A true and correct copy of the 860 Registration is attached hereto as Exhibit 97, bearing bate-stamp nos. LAU00023-36.

451. Attached to Lauer's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. LAU00023-36, which are on deposit with the 860 Registration.

452. On the face of the 857 Registration and 860 Registration (collectively, the "Lauer Registrations"), Ralph Lauer is listed as the Author and Copyright Claimant of all photographs contained therein.

453. The Firm's registration of the Lauer Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

454. The photographs attached to the Declaration of Ralph Lauer are referred to herein as the "Lauer Photographs".

455. The Firm deposited the Lauer Photographs with the USCO as part of and in connection with the application for the Lauer Registrations.

456. In Exhibit 1-B, the Lauer Photographs are listed and described under # 42083-42554 on the first column of the Getty Spreadsheet, demonstrating that the Lauer Photographs were copied by Getty.

**Rick Osentoski**

457. Rick Osentoski is a photographer who has an exclusive licensing agreement with Zuma.

458. Zuma requested that the Firm register photographs on Osentoski's behalf.

459. Osentoski is in possession of a copyright registration certificate, bearing No. VA 2-025-217 with effective date November 23, 2016 (the "217 Registration"). A true and correct copy of the 217 Registration is attached hereto as Exhibit 98, bearing bate-stamp nos. OSEN00009-12.

460. Attached to Osentoski's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp no. OSEN00014, which is on deposit with the 217 Registration.

461. On the face of the 217 Registration (the "Osentoski Registration"), Rick Osentoski is listed as the Author and Copyright Claimant of all photographs contained therein.

462. The Firm's registration of the Osentoski Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

463. The photograph attached to the Declaration of Rick Osentoski is referred to herein as the "Osentoski Photograph".

464. The Firm deposited the Osentoski Photograph with the USCO as part of and in connection with the application for the Osentoski Registration.

465. In Exhibit 1-B, the Osentoski Photograph is listed and described under #42854-42855 on the first column of the Getty Spreadsheet, demonstrating that the Osentoski Photograph was copied by Getty.

**Ricky Fitchett**

466. Ricky Fitchett is a photographer who has an exclusive licensing agreement with Zuma.

467. Zuma requested that the Firm register photographs on Fitchett's behalf.

468. Fitchett is in possession of a copyright registration certificate, bearing No. VA 2-022-341 with effective date November 15, 2016 (the "341 Registration"). A true and correct copy of the 341 Registration is attached hereto as Exhibit 99, bearing bate-stamp nos. FIT00429-442.

469. Attached to Fitchett's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. FIT000304-415, which are on deposit with the 341 Registration.

470. Fitchett is in possession of a copyright registration certificate, bearing No. VA 2-022-344 with effective date November 15, 2016 (the "344 Registration"). A true and correct copy of the 344 Registration is attached hereto as Exhibit 100, bearing bate-stamp nos. FIT00005-18.

471. Attached to Fitchett's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. FIT00048-194 and FIT00234-303, which are on deposit with the 344 Registration.

472. On the face of the 341 Registration and 344 Registration (collectively, the "Fitchett Registrations"), Ricky Fitchett is listed as the Author and Copyright Claimant of all photographs contained therein.

473. The Firm's registration of the Lauer Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

474. The photographs attached to the Declaration of Ricky Fitchett are referred to herein as the “Fitchett Photographs”.

475. The Firm deposited the Fitchett Photographs with the USCO as part of and in connection with the application for the Fitchett Registrations.

476. In Exhibit 1-B, the Fitchett Photographs are listed and described under # 42856-43227 on the first column of the Getty Spreadsheet, demonstrating that the Fitchett Photographs were copied by Getty.

**Ringo Chiu**

477. Ringo Chiu is a photographer who has an exclusive licensing agreement with Zuma.

478. Zuma requested that the Firm register photographs on Chiu’s behalf.

479. Chiu is in possession of a copyright registration certificate, bearing No. VA 2-023-228 with effective date November 5, 2016 (the “228 Registration”). A true and correct copy of the 228 Registration is attached hereto as Exhibit 101, bearing bate-stamp nos. CHIU00022-39.

480. Attached to Chiu’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp no. CHIU000069-337, which are on deposit with the 228 Registration.

481. Chiu is in possession of a copyright registration certificate, bearing No. VA 2-023-236 with effective date November 5, 2016 (the “236 Registration”). A true and correct copy of the 236 Registration is attached hereto as Exhibit 102, bearing bate-stamp nos. CHIU00012-17.

482. Attached to Chiu's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. CHIU00039, which is on deposit with the 236 Registration.

483. On the face of the 228 Registration and 236 Registration (collectively, the "Chiu Registrations"), Ringo Chiu is listed as the Author and Copyright Claimant of all photographs contained therein.

484. The Firm's registration of the Chiu Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

485. The photographs attached to the Declaration of Ringo Chiu are referred to herein as the "Chiu Photographs".

486. The Firm deposited the Chiu Photographs with the USCO as part of and in connection with the application for the Chiu Registrations.

487. In Exhibit 1-B, the Chiu Photographs are listed and described under # 43228-43508 on the first column of the Getty Spreadsheet, demonstrating that the Chiu Photographs were copied by Getty.

**Ron Bijlsma**

488. Ron Bijlsma is a photographer who has an exclusive licensing agreement with Zuma.

489. Zuma requested that the Firm register photographs on Bijlsma's behalf.

490. Bijlsma is in possession of a copyright registration certificate, bearing No. VA 2-080-298 with effective date December 20, 2017 (the "298 Registration"). A true and correct copy of the 298 Registration is attached hereto as Exhibit 103, bearing bate-stamp nos. BIJL00474-477.

491. Attached to Bijlsma's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. BILJ00448-58, which are on deposit with the 298 Registration.

492. Bijlsma is in possession of a copyright registration certificate, bearing No. VA 2-083-659 with effective date December 20, 2017 (the "659 Registration"). A true and correct copy of the 659 Registration is attached hereto as Exhibit 104, bearing bate-stamp nos. BILJ00460-473.

493. Attached to Bijlsma's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. BILJ00019-447, which are on deposit with the 659 Registration.

494. On the face of the 298 Registration and 659 Registration (collectively, the "Bijlsma Registrations"), Ron Bijlsma is listed as the Author and Copyright Claimant of all photographs contained therein.

495. The Firm's registration of the Bijlsma Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

496. The photographs attached to the Declaration of Ron Bijlsma are referred to herein as the "Bijlsma Photographs".

497. The Firm deposited the Bijlsma Photographs with the USCO as part of and in connection with the application for the Bijlsma Registrations.

498. In Exhibit 1-B, the Bijlsma Photographs are listed and described under # 45857-46415 on the first column of the Getty Spreadsheet, demonstrating that the Bijlsma Photographs were copied by Getty.

**Ruaridh Stewart**

499. Ruaridh Stewart is a photographer who has an exclusive licensing agreement with Zuma.

500. Zuma requested that the Firm register photographs on Stewart's behalf

501. Stewart is in possession of a copyright registration certificate, bearing No. VA 2-022-322 with effective date November 9, 2016 (the "322 Registration"). A true and correct copy of the 040 Registration is attached hereto as Exhibit 105, bearing bate-stamp nos. STEW00654-658.

502. Attached to Stewart's declaration in support of Plaintiffs' motion for partial summary judgment is a photograph bearing bate-stamp nos. STEW00652, which is on deposit with the 322 Registration (the "Stewart Photograph")

503. On the face of the 322 Registration (the "Stewart Registration"), Ruaridh Stewart is listed as the Author and Copyright Claimant of all photographs contained therein.

504. The Firm's registration of the Stewart Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

505. The Firm deposited the Stewart Photograph with the USCO as part of and in connection with the application for the Stewart Registration.

506. In Exhibit 1-B, the Stewart Photograph is listed and described under # 46416 on the first column of the Getty Spreadsheet, demonstrating that the Stewart Photograph was copied by Getty.

**Scott Mitchell**

507. Scott Mitchell is a photographer who has an exclusive licensing agreement with Zuma.

508. Zuma requested that the Firm register photographs on Mitchell's behalf.

509. Mitchell is in possession of a copyright registration certificate, bearing No. VA 2-022-676 with effective date November 4, 2016 (the “676 Registration”). A true and correct copy of the 676 Registration is attached hereto as Exhibit 106, bearing bate-stamp nos. MIT00005-10.

510. Attached to Mitchell’s declaration in support of Plaintiffs’ motion for partial summary judgment is a photograph bearing bate-stamp nos. MIT00020-52, which are on deposit with the 676 Registration (the “Mitchell Photographs”).

511. On the face of the 676 Registration (the “Mitchell Registration”), Scott Mitchell is listed as the Author and Copyright Claimant of all photographs contained therein.

512. The Firm’s registration of the Mitchell Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

513. The Firm deposited the Mitchell Photograph with the USCO as part of and in connection with the application for the Mitchell Registration.

514. In Exhibit 1-B, the Mitchell Photographs are listed and described under # 46531-46570 on the first column of the Getty Spreadsheet, demonstrating that the Mitchell Photographs were copied by Getty.

#### **Sergei Bachlakov**

515. Sergei Bachlakov is a photographer who has an exclusive licensing agreement with Zuma.

516. Zuma requested that the Firm register photographs on Bachlakov’s behalf.

517. Bachlakov is in possession of a copyright registration certificate, bearing No. VA 2-023-220 with effective date November 7, 2016 (the “220 Registration”). A true and correct copy of the 220 Registration is attached hereto as Exhibit 107, bearing bate-stamp nos. BACH00005-18.

518. Attached to Bachlakov's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. BACH00050-60, which are on deposit with the 220 Registration (the "Bachlakov Photographs").

519. On the face of the 220 Registration (the "Bachlakov Registration"), Sergei Bachlakov is listed as the Author and Copyright Claimant of all photographs contained therein.

520. The Firm's registration of the Bachlakov Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

521. The Firm deposited the Bachlakov Photographs with the USCO as part of and in connection with the application for the Bachlakov Registration.

522. In Exhibit 1-B, the Bachlakov Photographs are listed and described under # 46876-46886 on the first column of the Getty Spreadsheet, demonstrating that the Bachlakov Photographs were copied by Getty.

### **Theodore Liasi**

523. Theodore Liasi is a photographer who has an exclusive licensing agreement with Zuma.

524. Zuma requested that the Firm register photographs on Liasi's behalf.

525. Liasi is in possession of a copyright registration certificate, bearing No. VA 2-023-422 with effective date November 15, 2016 (the "422 Registration"). A true and correct copy of the 422 Registration is attached hereto as Exhibit 108, bearing bate-stamp nos. LIAS00007-10.

526. Attached to Liasi's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. LIAS00018-19, which are on deposit with the 422 Registration (the "Liasi Photographs").

527. On the face of the 422 Registration (the “Liasi Registration”), Theodore Liasi is listed as the Author and Copyright Claimant of all photographs contained therein.

528. The Firm’s registration of the Liasi Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

529. The Firm deposited the Liasi Photographs with the USCO as part of and in connection with the application for the Liasi Registration.

530. In Exhibit 1-B, the Liasi Photographs are listed and described under # 46936-46937 on the first column of the Getty Spreadsheet, demonstrating that the Liasi Photographs were copied by Getty.

#### **Timothy Hale**

531. Timothy Hale is a photographer who has an exclusive licensing agreement with Zuma.

532. Zuma requested that the Firm register photographs on Hale’s behalf.

533. Hale is in possession of a copyright registration certificate, bearing No. VA 2-031-994 with effective date November 7, 2016 (the “994 Registration”). A true and correct copy of the 994 Registration is attached hereto as Exhibit 109, bearing bate-stamp nos. HALE00009-12.

534. Attached to Hale’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. HALE00038-39, which are on deposit with the 994 Registration (the “Hale Photographs”).

535. On the face of the 994 Registration (the “Hale Registration”), Timothy Hale is listed as the Author and Copyright Claimant of all photographs contained therein.

536. The Firm's registration of the Hale Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

537. The Firm deposited the Hale Photographs with the USCO as part of and in connection with the application for the Hale Registration.

538. In Exhibit 1-B, the Hale Photographs are listed and described under # 46938-46939 on the first column of the Getty Spreadsheet, demonstrating that the Hale Photographs were copied by Getty.

**Wally Nell**

539. Wally Nell is a photographer who has an exclusive licensing agreement with Zuma.

540. Zuma requested that the Firm register photographs on Nell's behalf.

541. Nell is in possession of a copyright registration certificate, bearing No. VA 2-022-267 with effective date November 9, 2016 (the "267 Registration"). A true and correct copy of the 267 Registration is attached hereto as Exhibit 110, bearing bate-stamp nos. NELL00054-59.

542. Attached to Nell's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. NELL00061-151, which are on deposit with the 267 Registration.

543. Nell is in possession of a copyright registration certificate, bearing No. VA 2-023-761 with effective date November 8, 2016 (the "761 Registration"). A true and correct copy of the 761 Registration is attached hereto as Exhibit 111, bearing bate-stamp nos. NELL00018-29.

544. Attached to Nell's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp no. NELL00152-55, which are on deposit with the 761 Registration.

545. On the face of the 267 Registration and 761 Registration (collectively, the "Nell Registrations"), Wally Nell is listed as the Author and Copyright Claimant of all photographs contained therein.

546. The Firm's registration of the Nell Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

547. The photographs attached to the Declaration of Wally Nell are referred to herein as the "Nell Photographs".

548. The Firm deposited the Nell Photographs with the USCO as part of and in connection with the application for the Nell Registrations.

549. In Exhibit 1-B, the Nell Photographs are listed and described under # 46940-47035 on the first column of the Getty Spreadsheet, demonstrating that the Nell Photographs were copied by Getty.

**David Stephenson**

550. David Stephenson is a photographer who has an exclusive licensing agreement with Zuma.

551. Zuma requested that the Firm register photographs on Stephenson's behalf.

552. Stephenson is in possession of a copyright registration certificate, bearing No. VA 2-024-108 with effective date November 23, 2016 (the "108 Registration"). A true and correct copy of the 108 Registration is attached hereto as Exhibit 112, bearing bate-stamp nos. STEP00005-8.

553. Attached to Stephenson's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. STEP00010-13, which are on deposit with the 108 Registration (the "Stephenson Photographs").

554. On the face of the 108 Registration (the "Stephenson Registration"), David Stephenson is listed as the Author and Copyright Claimant of all photographs contained therein.

555. The Firm's registration of the Stephenson Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

556. The Firm deposited the Stephenson Photographs with the USCO as part of and in connection with the application for the Stephenson Registration.

557. In Exhibit 1-B, David Stephenson's Photographs, as attached to his declaration, are listed and described under # 20660-20663 in Column 1 of the Getty Spreadsheet, demonstrating that the Stephenson Photographs were copied by Getty.

### **PART THREE: WORK-FOR-HIRE / EMPLOYMENT**

#### **OSports (Mao Zhang)**

558. Mao Zhang is a photographer who has a work-for-hire agreement with OSports.

559. OSports requested that the Firm register photographs taken by Zhang on OSports' behalf.

560. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-049 with effective date August 9, 2017 (the "049 Registration"). A true and correct copy of the 049 Registration is attached hereto as Exhibit 113, bearing bate-stamp nos. OSP07759-7762.

561. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP07893-7925, which are on deposit with the 049 Registration.

562. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-050 with effective date August 9, 2017 (the "050 Registration"). A true and correct copy of the 049 Registration is attached hereto as Exhibit 114, bearing bate-stamp nos. OSP07763-7766.

563. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP08323-8358, which are on deposit with the 050 Registration.

564. On the face of the 049 Registration and 050 Registration (collectively, the "Mao Zhang Registrations"), Osports is listed as the Author and Copyright Claimant of all photographs contained therein (as employer-for hire for Mao Zhang).

565. The Firm's registration of the Mao Zhang Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

566. The photographs taken by Mao Zhang, which are displayed on each page of the document bearing bate-stamp nos. OSP07893-7925 and OSP08323-8358, are referred to herein as the "Mao Zhang Photographs."

567. The Firm deposited the Mao Zhang Photographs with the USCO as part of and in connection with the application for the Mao Zhang Registrations.

#### **OSports (Tongzhou Zhang)**

568. Tongzhou Zhang is a photographer who has a work-for-hire agreement with OSports.

569. OSports requested that the Firm register photographs taken by Tongzhou Zhang on OSports' behalf.

570. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-053 with effective date August 9, 2017 (the "053 Registration"). A true and correct copy of the 053 Registration is attached hereto as Exhibit 115, bearing bate-stamp nos. OSP07864-7867.

571. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP07926-7933, which are on deposit with the 053 Registration.

572. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-054 with effective date August 9, 2017 (the "054 Registration"). A true and correct copy of the 050 Registration is attached hereto as Exhibit 116, bearing bate-stamp nos. OSP07868-7873.

573. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP08146-8233, which are on deposit with the 054 Registration.

574. On the face of the 053 Registration and 054 Registration (collectively, the "Tongzhou Zhang Registrations"), Osports is listed as the Author and Copyright Claimant of all photographs contained therein (as employer-for hire for Tongzhou Zhang).

575. The Firm's registration of the Tongzhou Zhang Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

576. The photographs taken by Tongzhou Zhang, which are displayed on each page of the document bearing bate-stamp nos. OSP07926-7933 and OSP08146-8233, are referred to herein as the "Tongzhou Zhang Photographs."

577. The Firm deposited the Tongzhou Zhang Photographs with the USCO as part of and in connection with the application for the Tongzhou Zhang Registrations.

**OSports (Ruishi Cheng)**

578. Ruishi Cheng is a photographer who has a work-for-hire agreement with OSports.

579. OSports requested that the Firm register photographs taken by Ruishi Cheng on OSports' behalf.

580. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-055 with effective date August 9, 2017 (the "055 Registration"). A true and correct copy of the 055 Registration is attached hereto as Exhibit 117, bearing bate-stamp nos. OSP07785-7790.

581. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP07993-8031, which are on deposit with the 055 Registration.

582. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-056 with effective date August 9, 2017 (the "056 Registration"). A true and correct copy of the 056 Registration is attached hereto as Exhibit 118, bearing bate-stamp nos. OSP07777-7784.

583. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP08234-8322, which are on deposit with the 056 Registration.

584. On the face of the 055 Registration and 056 Registration (collectively, the "Ruishi Cheng Registrations"), Osports is listed as the Author and Copyright Claimant of all photographs contained therein (as employer-for hire for Ruishi Cheng).

585. The Firm's registration of the Ruishi Cheng Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

586. The photographs taken by Ruishi Cheng, which are displayed on each page of the document bearing bate-stamp nos. OSP079247-7991 and OSP08234-8322, are referred to herein as the “Ruishi Cheng Photographs.”

587. The Firm deposited the Ruishi Cheng Photographs with the USCO as part of and in connection with the application for the Ruishi Cheng Registrations.

#### **OSports (Meilin Xio)**

588. Meilin Xio is a photographer who has a work-for-hire agreement with OSports.

589. OSports requested that the Firm register photographs taken by Meilin Xio on OSports’ behalf.

590. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-060 with effective date August 9, 2017 (the “060 Registration”). A true and correct copy of the 060 Registration is attached hereto as Exhibit 119, bearing bate-stamp nos. OSP07851-7854.

591. Attached to Liu Ying’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. OSP08359-8377, which are on deposit with the 060 Registration (the “Meilin Xio Photographs”).

592. On the face of the 060 Registration (the “Meilin Xio Registration”), Osports is listed as the Author and Copyright Claimant of all photographs contained therein (as employer-for hire for Meilin Xio).

593. The Firm’s registration of the Meilin Xio Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

594. The Firm deposited the Meilin Xio Photographs with the USCO as part of and in connection with the application for the Meilin Xio Registrations.

#### **OSports (Yijiang Guo)**

595. Yijang Guo is a photographer who has a work-for-hire agreement with OSports.

596. OSports requested that the Firm register photographs taken by Yijang Guo on OSports' behalf.

597. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-305 with effective date August 9, 2017 (the "305 Registration"). A true and correct copy of the 305 Registration is attached hereto as Exhibit 120, bearing bate-stamp nos. OSP07801-7803.

598. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP07934-7946, which are on deposit with the 305 Registration.

599. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-308 with effective date August 9, 2017 (the "308 Registration"). A true and correct copy of the 308 Registration is attached hereto as Exhibit 121, bearing bate-stamp nos. OSP07805-7810.

600. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP08137-8145, which are on deposit with the 308 Registration.

601. On the face of the 305 Registration and 308 Registration (collectively, the "Yijang Guo Registrations"), Osports is listed as the Author and Copyright Claimant of all photographs contained therein (as employer-for hire for Yijang Guo).

602. The Firm's registration of the Yijang Guo Registrations was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

603. The photographs taken by Yijang Guo, which are displayed on each page of the document bearing bate-stamp nos. OSP07934-7946 and OSP08137-8145, are referred to herein as the "Yijang Guo Photographs."

604. The Firm deposited the Yijang Guo Photographs with the USCO as part of and in connection with the application for the Yijang Guo Registrations.

**OSports (Jian Wang)**

605. Jian Wang is a photographer who has a work-for-hire agreement with OSports.

606. OSports requested that the Firm register photographs taken by Jian Wang on OSports' behalf.

607. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-319 with effective date August 9, 2017 (the "319 Registration"). A true and correct copy of the 319 Registration is attached hereto as Exhibit 122, bearing bate-stamp nos. OSP07739-7748.

608. Attached to Liu Ying's declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. OSP07739-7748, which are on deposit with the 319 Registration (the "Jian Wang Photographs").

609. On the face of the 319 Registration (the "Jian Wang Registration"), Osports is listed as the Author and Copyright Claimant of all photographs contained therein (as employer-for hire for Jian Wang).

610. The Firm's registration of the Jian Wang Registration was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

611. The Firm deposited the Jian Wang Photographs with the USCO as part of and in connection with the application for the Jian Wang Registrations.

**OSports (Zichen Cao)**

612. Zichen Cao is a photographer who has a work-for-hire agreement with OSports.

613. OSports requested that the Firm register photographs taken by Zichen Cao on OSports' behalf.

614. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-322 with effective date August 9, 2017 (the “322 Registration”). A true and correct copy of the 322 Registration is attached hereto as Exhibit 123, bearing bate-stamp nos. OSP07837-7840.

615. Attached to Liu Ying’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. OSP07876-7892 and OSP08123-8135, which are on deposit with the 322 Registration (the “Zichen Cao Photographs”).

616. On the face of the 322 Registration (the “Zichen Cao Registration”), Osports is listed as the Author and Copyright Claimant of all photographs contained therein (as employer-for hire for Zichen Cao).

617. The Firm’s registration of the Zichen Cao Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

618. The Firm deposited the Zichen Cao Photographs with the USCO as part of and in connection with the application for the Zichen Cao Registrations.

#### **OSports (Yujun Ruan)**

619. Yujun Ruan is a photographer who has a work-for-hire agreement with OSports.

620. OSports requested that the Firm register photographs taken by Yujun Ruan on OSports’ behalf.

621. OSports is in possession of a copyright registration certificate, bearing No. VA 2-062-363 with effective date August 9, 2017 (the “363 Registration”). A true and correct copy of the 363 Registration is attached hereto as Exhibit 124, bearing bate-stamp nos. OSP07821-7826.

622. Attached to Liu Ying’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. OSP08083-8122 and OSP08032-8082, which are on deposit with the 322 Registration (the “Yujun Ruan Photographs”).

623. On the face of the 322 Registration (the “Yujun Ruan Registration”), Osports is listed as the Author and Copyright Claimant of all photographs contained therein (as employer-for hire for Yujun Ruan).

624. The Firm’s registration of the Yujun Ruan Registration was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

625. The Firm deposited the Yujun Ruan Photographs with the USCO as part of and in connection with the application for the Yujun Ruan Registrations.

626. In Exhibit 1-B, Osports’ Photographs, as attached to the declaration of Ling Yiu, are listed and described under # 41728-41990 in Column 1 of the Getty Spreadsheet, demonstrating that the Osports Photographs were copied by Getty.

**Action Sports (Ashley R. Dickerson)**

627. Ashley R. Dickerson is a photographer who had an employment relationship with Action Sports as of 2011 and 2012.

628. Action Sports requested that the Firm register photographs taken by Ashley Dickerson on Action Sports’ behalf.

629. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-080-338 with effective date December 22, 2017, bearing bate-stamp nos. ACT18879-18886 (the “338 Registration”) and which lists Action Sports’ name as the sole author (by employer-for-hire of Ashley R. Dickerson) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 338 Registration is attached hereto as Exhibit 125.

630. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT 11565-11629, ACT 11767-11870 and ACT016352-16407, which are on deposit with the 338 Registration.

631. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-080-343 with effective date December 22, 2017, bearing bate-stamp nos. ACT018889-18906 (the “343 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Ashley R. Dickerson) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 343 Registration is attached hereto as Exhibit 126.

632. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT014239-14296, ACT014487-14554, ACT014566-14570, ACT014605-14617, ACT014643-14700, ACT015274-15424, ACT015467-15498, ACT015629-15662, ACT015772-15780, ACT15793-15798, ACT015819-15826, ACT015844-145826, ACT015882-15892, ACT15955-15973, ACT15983-16017, ACT16114-16250, ACT016255-16304, ACT016467-16476, which are on deposit with the 343 Registration.

633. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-080-345 with effective date December 22, 2017, bearing bate-stamp nos. ACT018907-18912 (the “345 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Ashley R. Dickerson) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 345 Registration is attached hereto as Exhibit 127.

634. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT018137-18204 and ACT018281-18350, which are on deposit with the 345 Registration.

635. The Firm’s registration of the 338 Registration, 343 Registration, and 345 Registration (collectively, the “Dickerson Registrations”) was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

636. The photographs taken by Ashley R. Dickerson, which are identified herein and attached to the Declaration of Walter G. Arce, Sr. are collectively referred to as the “Dickerson Photographs.”

637. The Firm deposited the Dickerson Photographs with the USCO as part of and in connection with the application for the Dickerson Registrations.

**Action Sports (Crystal A. Macleod)**

638. Crystal A. Macleod is a photographer who had an employment relationship with Action Sports as of 2011 and 2012.

639. Action Sports requested that the Firm register photographs taken by Crystal Macleod on Action Sports’ behalf.

640. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-065-050 with effective date July 23, 2017, 2017, bearing bate-stamp nos. ACT11416-011431 (the “050 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Crystal A. Macleod) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 050 Registration is attached hereto as Exhibit 128.

641. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT013263-13278 and ACT013379-13476, which are on deposit with the 050 Registration.

642. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-065-051 with effective dated July 23, 2017, 2017, bearing bate-stamp nos. ACT011416-11431 (the “051 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Crystal A. Macleod) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 051 Registration is attached hereto as Exhibit 129.

643. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT017900-18016, ACT018039-18087, ACT018205-18280, ACT018351-18374, ACT018436-18515, ACT018652-18783, which are on deposit with the 051 Registration.

644. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-065-052 with effective dated July 23, 2017, bearing bate-stamp nos. ACT11480-11495 (the “052 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Crystal A. Macleod) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 052 Registration is attached hereto as Exhibit 130.

645. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT012352-12365-12376, ACT014789-14899 and ACT015024-15160, which are on deposit with the 052 Registration.

646. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-065-053 with effective date July 22, 2017, bearing bate-stamp nos. ACT11384-11399 (the “053 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Crystal A. Macleod) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 053 Registration is attached hereto as Exhibit 131.

647. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT012915-12922, ACT012988-13003, ACT013051-13148, ACT013507-13519, ACT013530-13651, ACT013929-13944, ACT014005-14044, ACT014094-14109, ACT014145-14199, which are on deposit with the 053 Registration.

648. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-067-057 with effective date July 22, 2017, bearing bate-stamp nos. ACT011342-11341 (the “057 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Crystal A. Macleod) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 057 Registration is attached hereto as Exhibit 132.

649. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT013503-13503, ACT016913-17002, ACT017018-17084, ACT017220-17299, ACT017322-17361, ACT017374-17380, ACT017382-17389, ACT017404-17410, ACT017420-17428, ACT017430-17461, ACT017480-17506, ACT017558-17768, ACT017827-17846, ACT017866-17899, and ACT018375-18434, which are on deposit with the 057 Registration.

650. The Firm’s registration of the 050 Registration, 051 Registration, 052 Registration, 053 Registration, and 057 Registration (collectively, the “Macleod Registrations”) was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

651. The photographs taken by Crystal A. Macleod, which are identified herein and attached to the Declaration of Walter G. Arce, Sr. are collectively referred to as the “Macleod Photographs.”

652. The Firm deposited the Macleod Photographs with the USCO as part of and in connection with the application for the Macleod Registrations.

#### **Action Sports (Stephen A. Arce)**

653. Stephen A. Arce is a photographer who had an employment relationship with Action Sports as of 2011 and 2012.

654. Action Sports requested that the Firm register photographs taken by Stephen A. Arce on Action Sports' behalf.

655. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-067-013 with effective date July 22, 2017, 2017, bearing bate-stamp nos. ACT011448-11463 (the "013 Registration") which lists Action Sports' name as the sole author (by employer-for-hire of Stephen A. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 013 Registration is attached hereto as Exhibit 133.

656. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT 11640-11766, ACT 11988-11989, ACT 11995-12037, ACT 12169-12191, ACT 12217-12275, ACT012377-12402, ACT012563-12585 and ACT012639-12678, which are on deposit with the 013 Registration.

657. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-067-038 with effective date July 21, 2017, bearing bate-stamp nos. ACT011496-11511 (the "038 Registration") which lists Action Sports' name as the sole author (by employer-for-hire of Stephen A. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 038 Registration is attached hereto as Exhibit 134.

658. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT 11525-11564, ACT014900-14995, ACT015161-15168, ACT015499-15628, ACT015699-15706, ACT015750-15771, ACT015781-15792, ACT015827-15830, ACT015922-15954, ACT016075-16080, ACT016086-16091, ACT016107-16113, ACT016305-16351, ACT016446-16462, ACT016477-16632, which are on deposit with the 038 Registration.

659. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-067-041 with effective date July 21, 2017, bearing bate-stamp nos. ACT011400-11415 (the “041 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Stephen A. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 041 Registration is attached hereto as Exhibit 135.

660. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT012038-12168, ACT012276-12295, ACT014555-14565, ACT014571-14604, ACT014618-14642, ACT014701-14708, which are on deposit with the 041 Registration.

661. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-084-309 with effective date July 21, 2017, bearing bate-stamp nos. ACT018988-19003 (the “309 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Stephen A. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 309 Registration is attached hereto as Exhibit 136.

662. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT012700-12800, ACT012927-12987, ACT013004-13050, ACT013149-13226, ACT013672-13745, ACT013830-13884, ACT013886-13928, ACT013945-13951, ACT013966-13974, ACT014045-14092, ACT014110-14144, ACT014212-14218, ACT014225-14238, ACT015799-15810, ACT017300-17321, which are on deposit with the 309 Registration.

663. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-070-663 with effective date July 21, 2017, bearing bate-stamp nos. ACT011366-11383 (the “663 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire

of Stephen A. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 663 Registration is attached hereto as Exhibit 137.

664. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT 15425-15465, ACT016633-16685, ACT016714-16785, ACT017003-17017, ACT017085-17118, ACT017290-017403, ACT017411-17419, ACT017429, ACT017462-17479, ACT017507-17557, ACT017769-17826, and ACT017847-017865, which are on deposit with the 663 Registration.

665. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-064-821 with effective date July 20, 2017, bearing bate-stamp nos. ACT011332-11339 (the "821 Registration") which lists Action Sports' name as the sole author (by employer-for-hire of Stephen A. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 821 Registration is attached hereto as Exhibit 138.

666. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT013477-135501, ACT018017-18038, ACT018088-18136, ACT018516-18569, ACT018570-18651, ACT018784-18850 and ACT18851-18878, which are on deposit with the 821 Registration.

667. The Firm's registration of the 013 Registration, 038 Registration, 041 Registration, 309 Registration, 663 Registration, and 821 Registration (collectively, the "Stephen Arce Registrations") was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

668. The photographs taken by Stephen A. Arce, which are identified herein and attached to the Declaration of Walter G. Arce, Sr. are collectively referred to as the "Stephen Arce Photographs."

669. The Firm deposited the Stephen Arce Photographs with the USCO as part of and in connection with the application for the Stephen Arce Registrations.

**Action Sports (Walter G. Arce, Sr.)**

670. Walter G. Arce, Sr. is a photographer and principal of Action Sports who had an employment relationship with Action Sports as of 2011 and 2012.

671. Action Sports requested that the Firm register photographs taken by Walter G. Arce on Action Sports' behalf.

672. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-066-274 with effective date July 20, 2017, bearing bate-stamp nos. ACT011356-11365 (the "274 Registration") which lists Action Sports' name as the sole author (by employer-for-hire of Walter G. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 274 Registration is attached hereto as Exhibit 139.

673. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT017131-17208, ACT017119-17120, ACT017219-17219 and ACT017373-17373, which are on deposit with the 274 Registration.

674. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-080-336 with effective date December 22, 2017, bearing bate-stamp nos. ACT018943-18948 (the "336 Registration") which lists Action Sports' name as the sole author (by employer-for-hire of Walter G. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 336 Registration is attached hereto as Exhibit 140.

675. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT012923-12926,

ACT012913-12914, ACT012690-12692, ACT012801-12821, ACT013504-13505, ACT013652-13658, ACT013746-13829, ACT013952-13965, ACT014093-14093, ACT014709-14713, and ACT014200-14211 ACT014219-14224, which are on deposit with the 336 Registration.

676. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-059-530 with effective date July 28, 2017, bearing bate-stamp nos. ACT011464-11479 (the “530 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Walter G. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 530 Registration is attached hereto as Exhibit 141.

677. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT 11879-11922, ACT 11973-11987, ACT 11990-11994, ACT 12192-12216, ACT 12297-12351, ACT012403-12516, ACT013227-13234, ACT014714-14788, ACT014996-15023, ACT015169-15270, ACT015707-15749, ACT015811-15818, ACT015831-15843, ACT015878-15881, ACT015893-15921, ACT015974-15982, ACT016018-16074, ACT016081-16085, ACT016092-16106, ACT016251-16253, ACT016254-16254, ACT016408-16444, ACT016463-16466, which are on deposit with the 530 Registration.

678. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-059-834 with effective date July 20, 2017, bearing bate-stamp nos. ACT011432-11447 (the “834 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Walter G. Arce) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 834 Registration is attached hereto as Exhibit 142.

679. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT012519-12562,

ACT012586-12638, ACT012679-12688 and ACT013279-13378, which are on deposit with the 834 Registration.

680. The Firm's registration of the 274 Registration, 336 Registration, 530 Registration, and 834 Registration (collectively, the "Walter Arce Registrations") was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

681. The photographs taken by Walter G. Arce, which are identified herein and attached to the Declaration of Walter G. Arce, Sr. are collectively referred to as the "Walter Arce Photographs."

682. The Firm deposited the Walter Arce Photographs with the USCO as part of and in connection with the application for the Walter Arce Registrations.

**Action Sports (Stephen Houchen)**

683. Stephen Houchen is a photographer who had an employment relationship with Action Sports as of 2012.

684. Action Sports requested that the Firm register photographs taken by Stephen Houchen on Action Sports' behalf.

685. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-080-340 with effective date December 22, 2017, bearing bate-stamp nos. ACT018939-18942 (the "340 Registration") which lists Action Sports' name as the sole author (by employer-for-hire of Stephen Houchen) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 340 Registration is attached hereto as Exhibit 143.

686. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT011871-11878,

ACT011923-11972 and ACT012518, which are on deposit with the 340 Registration (the “Houchen Photographs”).

687. The Firm’s registration of the 340 Registration (the “Houchen Registration”) was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

688. The Firm deposited the Houchen Photographs with the USCO as part of and in connection with the application for the Houchen Registration.

**Action Sports (John F. Moore)**

689. John F. Moore is a photographer who had an employment relationship with Action Sports as of 2012.

690. Action Sports requested that the Firm register photographs taken by John F. Moore on Action Sports’ behalf.

691. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-080-342 with effective date December 22, 2017, bearing bate-stamp nos. ACT018919-18922 (the “342 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of John F. Moore) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 342 Registration is attached hereto as Exhibit 144.

692. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT012693-12699 and ACT013506, which are on deposit with the 342 Registration (the “Moore Photographs”).

693. The Firm’s registration of the 342 Registration (the “Moore Registration”) was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

694. The Firm deposited the Moore Photographs with the USCO as part of and in connection with the application for the Moore Registration.

**Action Sports (Michael G. Dinovo)**

695. Michael G. Dinovo is a photographer who had an employment relationship with Action Sports as of 2011 and 2012.

696. Action Sports requested that the Firm register photographs taken by Michael G. Dinovo on Action Sports' behalf.

697. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-080-335 with effective date December 22, 2017, bearing bate-stamp nos. ACT018931-18938 (the "335 Registration") which lists Action Sports' name as the sole author (by employer-for-hire of Michael G. Dinovo) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 335 Registration is attached hereto as Exhibit 145.

698. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT012689-12689, ACT012822-12912, ACT013659-13671, ACT013885-13885, ACT013975-14004, ACT015663-15698, which are on deposit with the 335 Registration.

699. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-080-341 with effective date December 22, 2017, bearing bate-stamp nos. ACT018923-18888 (the "341 Registration") which lists Action Sports' name as the sole author (by employer-for-hire of Michael G. Dinovo) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 341 Registration is attached hereto as Exhibit 146.

700. Attached to Walter G. Arce, Sr.'s declaration in support of Plaintiffs' motion for partial summary judgment are photographs bearing bate-stamp nos. ACT014297-14485,

ACT016686-16713, ACT016786-16912, ACT017209-17218, ACT017366-17372, which are on deposit with the 341 Registration.

701. The photographs taken by Michael G. Dinovo, which are identified herein and attached to the Declaration of Walter G. Arce, Sr. are collectively referred to as the “Dinovo Photographs.”

702. The Firm’s registration of the 335 Registration and 341 Registration (the “Dinovo Registrations”) was carried out in accordance with the Firm’s routine practice of registering clients’ photographs with the USCO.

703. The Firm deposited the Dinovo Photographs with the USCO as part of and in connection with the application for the Dinovo Registration.

**Action Sports (Jerome G. Hamilton)**

704. Jerome G. Hamilton is a photographer who had an employment relationship with Action Sports as of 2011.

705. Action Sports requested that the Firm register photographs taken by Jerome G. Hamilton on Action Sports’ behalf.

706. Action Sports is in possession of a copyright registration certificate, bearing No. VA 2-083-652 with effective date December 24, 2017, bearing bate-stamp nos. ACT019004-19007 (the “652 Registration”) which lists Action Sports’ name as the sole author (by employer-for-hire of Jerome G. Hamilton) and copyright claimant of the photographs on deposit therewith. A true and correct copy of the 652 Registration is attached hereto as Exhibit 147.

707. Attached to Walter G. Arce, Sr.’s declaration in support of Plaintiffs’ motion for partial summary judgment are photographs bearing bate-stamp nos. ACT017121-17130, which are on deposit with the 652 Registration (the “Hamilton Photographs”).

708. The Firm's registration of the 652 Registration (the "Hamilton Registration") was carried out in accordance with the Firm's routine practice of registering clients' photographs with the USCO.

709. The Firm deposited the Hamilton Photographs with the USCO as part of and in connection with the application for the Hamilton Registration.

710. In Exhibit 1-B, Action Sports' Photographs, as attached to the declaration of Walter G. Arce, Sr., are listed and described under # 3954-11398 in Column 1 of the Getty Spreadsheet, demonstrating that the Action Sports Photographs were copied by Getty.

### **DEPOSITION TRANSCRIPTS**

711. Attached as Exhibit 148 is a true and correct copy of excerpts from the deposition transcript of Les Walker, dated April 23, 2018, including relevant exhibits.

712. Attached as Exhibit 149 is a true and correct copy of excerpts from the deposition transcript of Scott McKiernan, dated May 2, 2018, including relevant exhibits.

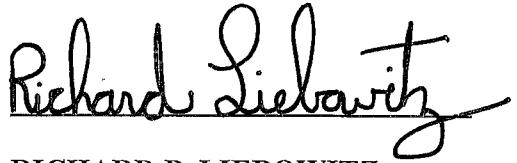
713. Attached as Exhibit 150 is a true and correct copy of excerpts from the deposition transcript of Seth Greenberg, dated May 4, 2018, including relevant exhibits.

714. Attached as Exhibit 151 is a true and correct copy of excerpts from the deposition transcript of Ruaridh Stewart, dated May 3, 2018, including relevant exhibits.

715. Attached as Exhibit 152 is a true and correct copy of excerpts from the deposition transcript of Travis Lindquist, dated May 8, 2018, including relevant exhibits.

716. Attached as Exhibit 153 is a Copyright Registration-Photo Tracking Index prepared as a reference tool in connection with the present motion.

Dated: June 29, 2018  
Valley Stream, NY

  
**RICHARD P. LIEBOWITZ**